


FORM 1 GENERAL		 U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)																																																						
II. POLLUTANT CHARACTERISTICS																																																								
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.																																																								
<table border="1"> <thead> <tr> <th rowspan="2">SPECIFIC QUESTIONS</th> <th colspan="3">MARK 'X'</th> <th rowspan="2">SPECIFIC QUESTIONS</th> <th colspan="3">MARK 'X'</th> </tr> <tr> <th>YES</th> <th>NO</th> <th>FORM ATTACHED</th> <th>YES</th> <th>NO</th> <th>FORM ATTACHED</th> </tr> </thead> <tbody> <tr> <td>A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)</td> <td></td> <td>X</td> <td></td> <td>B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)</td> <td>X</td> <td></td> <td></td> <td>D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)</td> <td>X</td> <td></td> <td></td> <td>F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)</td> <td></td> <td>X</td> <td></td> <td>H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)</td> <td></td> <td>X</td> <td></td> <td>J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)</td> <td></td> <td>X</td> <td></td> </tr> </tbody> </table>			SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'			YES	NO	FORM ATTACHED	YES	NO	FORM ATTACHED	A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X		C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X		E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X		G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X		I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
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EPA I.D. NUMBER F C A D 0 4 4 6 9 6 1 0 2 2 D														
GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.														

III. NAME OF FACILITY 1 SKIP The Marquardt Co. THE																																																																																																																																						
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VII. SIC CODES (4-digit, in order of priority)									
A. FIRST					B. SECOND				
7 3,7,6,4 (specify) Guided Missiles and Space Vehicles Propulsion Units					7 3,7,2,8 (specify) Aircraft & Parts-Ramair Turbines				
C. THIRD					D. FOURTH				
7 3,7,2,4 (specify) Aircraft Engines & Parts-Air Scoops					7 (specify)				
VIII. OPERATOR INFORMATION									
A. NAME									
8 The Marquardt Co.									
B. Is the name listed in Item VIII-A also the owner? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO									
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)									
F - FEDERAL M - PUBLIC (other than federal or state) P (specify) S - STATE O - OTHER (specify) P - PRIVATE									
D. PHONE (area code & no.)									
A 213 989 6400									
E. STREET OR P.O. BOX									
16555 Saticoy St.									
F. CITY OR TOWN									
B Van Nuys									
G. STATE									
C a									
H. ZIP CODE									
91406									
IX. INDIAN LAND									
Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO									
X. EXISTING ENVIRONMENTAL PERMITS									
A. NPDES (Discharges to Surface Water)									
C T I 9 N C A 0 0 0 3 3 4 4									
D. PSD (Air Emissions from Proposed Sources)									
C T I 9 P									
B. UIC (Underground Injection of Fluids)									
C T I 9 U									
E. OTHER (specify)									
C. RCRA (Hazardous Wastes)									
C T I 9 R									
E. OTHER (specify)									
XI. MAP									
F9: A/50									
Attach to this application a map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for map requirements.									
XII. NATURE OF BUSINESS (prev)									
F9: A/51									
The Marquardt Company manufactures Ramjet and Rocket Engines and fabricates other Aero/Space Hardware.									
XIII. CERTIFICATION (see instructions)									
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.									
A. NAME & OFFICIAL TITLE (type or print)									
J.A. Marossy, Vice President Finance									
B. SIGNATURE									
[Signature]									
C. DATE SIGNED									
19 Nov. 1980									
COMMENTS FOR OFFICIAL USE ONLY									
[Blank]									

Please print or type in the unshaded areas only.
(fill-in areas are spaced for elite type, i.e., 1 space (inch).)

Form Approved OMB No. 158-S80004

FORM 3
RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

EPA I.D. NUMBER

5	6	7	8	9	0	4	4	6	9	6	1	0	2	T/A	C
F	C	A	D	0	4	4	6	9	6	1	0	2			

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR.	MO.	DAY
8	7	2

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY			
<u>Storage:</u>			<u>Treatment:</u>					
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY			
TANK	S02	GALLONS OR LITERS		T02	GALLONS PER DAY OR LITERS PER DAY			
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	SURFACE IMPOUNDMENT		TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR			
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	INCINERATOR	T03				
<u>Disposal:</u>			<i>OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or inciner- ators. Describe the processes in the space provided; Item III-C.)</i>					
INJECTION WELL	D79	GALLONS OR LITERS					T04	GALLONS PER DAY OR LITERS PER DAY
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER						
LAND APPLICATION	D81	ACRES OR HECTARES						
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY						
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS						
UNIT OF MEASURE CODE			UNIT OF MEASURE CODE					
UNIT OF MEASURE			UNIT OF MEASURE					
GALLONS.	G		LITERS PER DAY	V	ACRE-FEET.	A		
LITERS	L		TONS PER HOUR	D	HECTARE-METER.	F		
CUBIC YARDS	Y		METRIC TONS PER HOUR.	W	ACRES.	B		
CUBIC METERS	C		GALLONS PER HOUR	E	HECTARES.	Q		
GALLONS PER DAY	U		LITERS PER HOUR	H				

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)			1. AMOUNT	2. UNIT OF MEASURE (enter code)
X-1	S 0 2	600	G	5			
X-2	T 0 3	20	E	6			
1	S 0 2	5,000	G	7			
2	S 0 1	18,150 (Drum Storage)	G	8			
3				9			
4				10			

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS	P
TONS	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS	K
METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZ. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY													
W C A D O 4 4 6 9 6 1 0 2 1													W DUP 2 DUP													
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																										
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																			
							1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))											
1	F	0	0	1	7000	P	S	0	1																	
2	F	0	0	6	1000	P	S	0	1																	
3	F	0	0	7	1000	P	S	0	1																	
4	F	0	0	8	100	P	S	0	1																	
5	F	0	0	9	2100	P	S	0	1																	
6	F	0	1	0	100	P	S	0	1																	
7	F	0	1	2	100	P	S	0	1																	
8	F	0	0	5	14,000	P	S	0	2																	
9	D	0	0	1	500	P	S	0	1																	Paint Waste and Waste Filters.
10																										
11																										
12																										
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25																										
26																										

IV. DESCRIPTION OF HAZARDOUS WASTES, (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

S	F	C	A	D	0	4	4	6	9	6	1	0	2	T/A/C	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

3	4	1	2	3	0
65	66	67	68	69	70

1	1	8	2	9	3	0
72	73	74	75	76	77	78

VIII. FACILITY OWNER

- ☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX										4. CITY OR TOWN										5. ST.		6. ZIP CODE					
C	E	15	16	17	18	19	20	21	22	C	G	23	24	25	26	27	28	29	30								

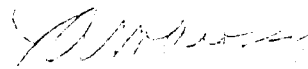
IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

J.A. Marossy, Vice Pres. Finance

B. SIGNATURE



C. DATE SIGNED

11-19-80

X. OPERATOR CERTIFICATION

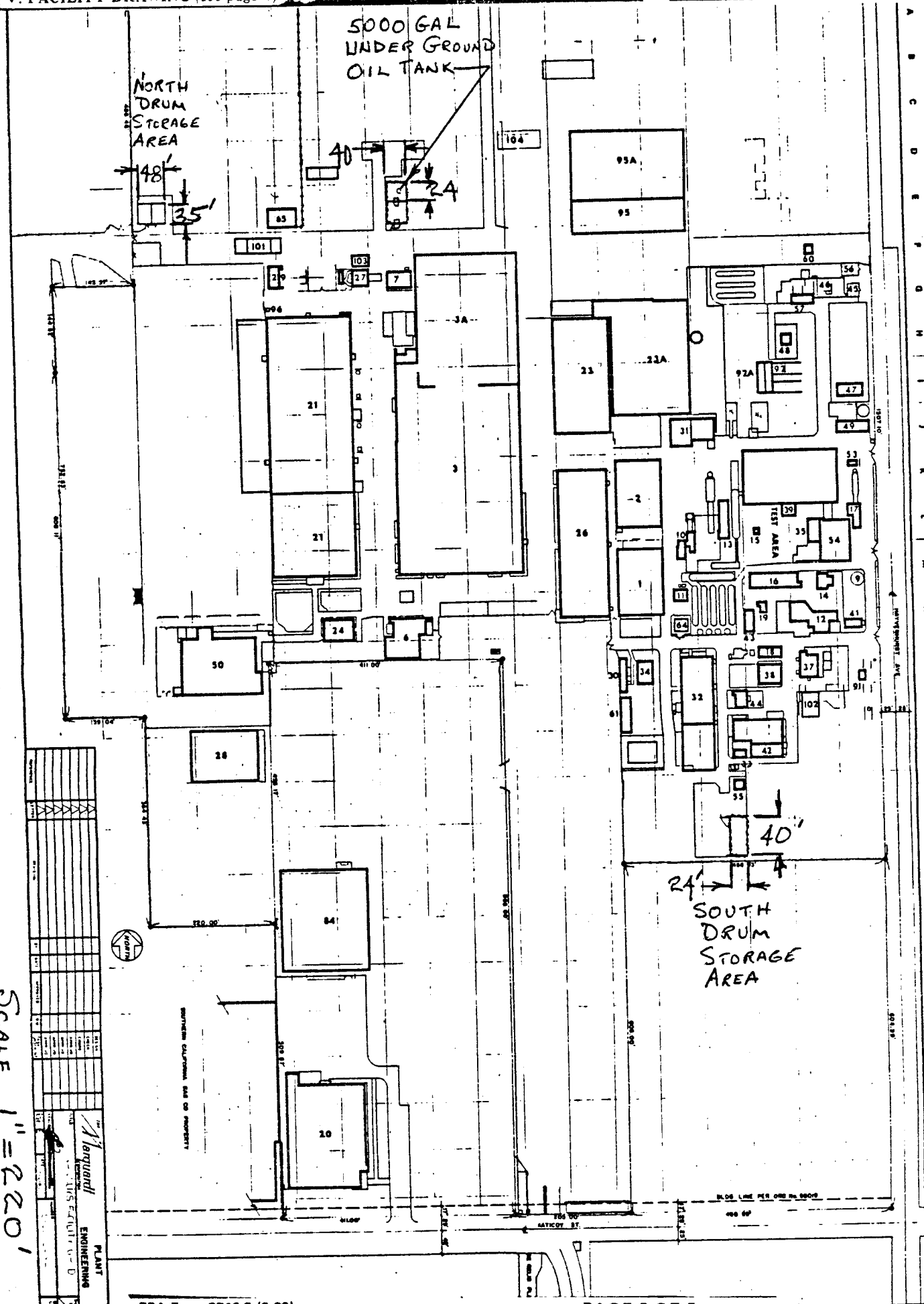
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

V. FACILITY DRAWING (see page 4)



SCALE 1"=220'

S. Bradley M/S 3-C7



THE *Marquardt* COMPANY
MEMBER OF ISC DEFENSE & SPACE GROUP

16555 Saticoy Street • VAN NUYS, CA 91409-9104

TO: California Department of Health Services
Southern California Section
Toxic Substances Control Division
107 South Broadway, Room 7128
Los Angeles, CA 90012

ATTENTION: John Hinton

TMC FORM 562 Rev. 7/87

11-8-88

Dear Mr. Hinton,

This is our rough draft. We will
send you a final bound copy
after you have had a chance to
review it and request changes
or additions.

Sharon Bradley,

Facilities Environmental Analyst

RECORDS SEPARATOR PAGE

RECORDS SEPARATOR PAGE

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**RECORDS
SEPARATOR
PAGE**

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THE MARQUARDT COMPANY

Ferranti International

September 2, 1992

Mr. James McCammon
Senior Hazardous Materials Specialist
Department of Toxic Substances Control
1405 N. San Fernando Blvd.
Suite 300
Burbank, CA 91504

RESPONSE TO REPORT OF VIOLATION AND SCHEDULE FOR COMPLIANCE
Dated August 12, 1992: Received August 13, 1992.

COUNT 1: We have no understanding of why we were cited under this section. Section 66265.112 (d)(1) states:
"The owner or operator shall submit the closure plan to the Department at least 180 days prior to the date on which the owner or operator expects to begin closure of the surface impoundment....."

We submitted the plan to you on February 12, 1992. The code requires you to review the plan within 90 days. We received your notice of deficiencies on August 11, 1992, 180 days later. In the meantime we have not begun any closure activities on the waste treatment areas, we have simply stopped treating waste in them.

Further 66265.112(d)(2) defines "expects to begin closure" as "either no later than the date on which any hazardous waste management unit receives the known final volume of hazardous waste or, if there is a reasonable possibility that the hazardous waste management unit will receive additional hazardous wastes, no later than one year after the date on which the unit received the most recent volume of hazardous waste. Up until December 31, 1991, when the actual leasing agreement was signed with Kaiser Marquardt, The Marquardt Company had every reason to believe that a reasonable possibility to receive additional hazardous waste existed since part of the leasing negotiations were to install a recycling system on the test facility after Kaiser Marquardt



declined to apply for Part B permit. Therefore, The Marquardt Company was well within the 180 day limit when it submitted the closure plan in February of 1992.

PLEASE REMOVE THIS COUNT.

COUNT 2: On June 10, 1992 there where two to three barrels in the storage area that had the tops unsecured, but not off. Victor Castrano and a representative from Martin Industrial Pumping were in the hazardous waste storage area at the time of the inspection by the DTSC personnel, testing the contents of these barrels for shipment the following day. See EXHIBIT 1, Uniform Hazardous Waste Manifest, AR 511337, ship date, June 11, 1992. The barrels were not unattended and the lids were unsecured but not off while they were conducting their testing samples for shipment the follwing day. Therefore since they were removing waste to sample it, this is not a code violation. DTSC personnel did not speak to these people and ask them what they were doing in the storage area. The Martin representative continued testing and Victor Castrano joined the DTSC personnel for the rest of the tour.

PLEASE REMOVE THIS COUNT

COUNT 3: The Marquardt Company agrees that this was in fact the case on the June 10, 1992 visit. Items not belonging to The Marquardt Company had been placed in the TMC storage area without the consent of TMC by Kaiser Marquardt due to a misunderstanding on Kaiser Marquardt's part. However, the storage area is TMC's responsibility and we take the full responsibility for this error. We have now labeled all items in the storage area with accumulation dates and contents and are in the process of having all this material shipped out to a proper disposal area.

A Certificate of Compliance for this item is attached.

COUNT 4: We admit to this (see Count 3) and have attached a Certificate of Compliance for this.

COUNT 5: We have been through all our manifests. We believe



that DTSC personnel took copies of manifests that had previous been the subject of last year's complaint and which have been corrected or explained to the satisfaction of DTSC's legal department. In particular one waste manifest was for recycled oily waste which does not require a signature which we have previously been over with DTSC personnel. There was a current manifest (see Exhibit 1) that was cancelled and a new one put its place. Please provide a specific list of manifests that fail to meet the code. But please make sure they are for hazardous waste and not for oily waste water or recycleable materials.

UNLESS A LIST OF MANIFEST NUMBERS ARE PROVIDED, PLEASE REMOVE THIS COUNT. WE MAINTAIN THAT ALL OUR MANIFESTS ARE CORRECTLY FILLED OUT.

COUNT 6: We have gone through all our manifests for the required signature. Again, recycled material and petroleum based materials do not constitute hazardous waste and do not therefore require a signature from the receiving facility. Further, again see Exhibit 1, the only other manifest in house without a facility signature was the one that was rewritten due to the need to send the material to another facility. The cancelled manifest would not require a signature since the material was not shipped on it. Exhibit 1 shows the replacement manifest with required facility signatures.

PLEASE REMOVE THIS COUNT UNLESS YOU CAN PROVIDE A SPECIFIC LIST OF MANIFEST NUMBERS THAT REQUIRE FACILITY SIGNATURES AND THAT ARE MISSING. WE MAINTAIN THAT ALL OUR MANIFESTS HAVE THE REQUIRED SIGNATURES.

COUNT 7: All records relating to The Marquardt Company are retained on site. As to the June 10, 1992 visit DTSC asked for the records relating to the complaint of last year. These were all available for review. DTSC personnel did not indicate that they required other records then those they had previously requested or these would have also been made available to them. All storage of records is maintained on site at the Marquardt facility although sometimes retrieval of old records takes a day or two. At no time did any DTSC personnel request current records which would have been given to them. They made no request and simply went through the files on last year's



complaint as they had said they wanted to and was the stated purpose of their visit.

PLEASE REMOVE THIS COUNT

COUNT 8: TMC has maintained the following information as specified under 66265.16 (d)(1)(2) in that there are now only two employees of The Marquardt Company, Mr. Emmons Brown, Facility Manager and Mr Joe Tamusaitis, President. Duties, which are not clearly defined, are split between them. However, as of September 11, 1992, The Marquardt Company will only have a single employee, Mr. Joe Tamusaitis who will manage the site and handle all other Marquardt Company business. We have attached an amendment to the Part B permit which states that there is only one person employed by The Marquardt Company. A certificate of compliance is attached for this item.

COUNT 9: We have no understanding of this. Attached is the Amendment form to the Emergency Buisness Plan which is incorporated into the Part B permit showing Joe Tamusaitis as the on-site manager and Emmons Brown as the emergency contact with TMC security as the secondary contact. The amendment is in its proper place as the first page of Emergency Business Plan as required with a tab indicating it as a Amendment. The Amendment was bound in the plan on February 12, 1992 as the date shows. Security records show the next visit from LA Fire Department as March 18, 1992 and they were provided a copy of the Amendment on that date. EXHIBIT 2

PLEASE REMOVE THIS COUNT

COUNT 10: The code specifies that the plan include the current number of the State Office of Emergency Services. The 800 number listed on page 98 of the Part B Permit (which is incorporated as part of The Marquardt Company's Emergency Business Plan) for the Office of Emergency Services is current. The second number listed which is their office is old. Marquardt has updated the plan to reflect the new office number. However, the code does not specify which number is required and the 800 number we have listed is operative and current. Therefore we are not in code violation. EXHIBIT 3

PLEASE REMOVE THIS COUNT



COUNT 11: We have no understanding of this count as we have met the code requirements and the Part B permit has been on file with your department for at least two years. EXHIBIT 4 is pages 83-85 from the Part B permit as shown in the table of contents which list all the safety equipment, location and description as required by the code.

PLEASE REMOVE THIS COUNT

COUNT 12: There has been no change of ownership. Marquardt sold some of its business assets to Kaiser Marquardt which consists of the same personnel as before on the test facility. The government contracts for which the work has to be performed on are still under the control of The Marquardt Company and require approval from the government before any kind of transfer could be made. The buildings and land, all 56 acres are still owned by The Marquardt Company. What exists is primarily a leasing operation of Marquardt assets.

PLEASE REMOVE THIS COUNT

COUNT 13: We have an impeccable record in this area. We have no knowledge as to what precipitated this gross misrepresentation of our operational procedures. The Fire Department along with the Police Department, South Coast Air Quality and the Los Angeles City Sanitation Department conduct regular inspections of our facility and certainly would have cited us long before a one time visit from DTSC if we were operating our facility in the manner described.

PLEASE REMOVE THIS COUNT

COUNT 14: TMC received a call from DTSC personnel at 9 AM on May 27, 1992 stating that they would be coming to the facility that day. When asked as to the purpose of their visit, DTSC personnel stated that it was to check up on the previous complaint (January 1991) for compliance and asked to see the records pertaining to that complaint. They were told on the phone that the records could not be made available to them on the 27th as they were in storage



and at least a day was required for retrieval but would be made available at whatever date they scheduled for their next visit. DTSC said they would come out anyway as there were other things they wanted to check on as regards the previous complaint. We believe this constitutes reasonableness on our part.

PLEASE REMOVE THIS COUNT

COUNT 15: We have no knowledge of what precipitated this count. EXHIBIT 5 is a list of inventory of the hazardous waste area as of December 31, 1991, the last time that waste was put into the storage area by The Marquardt Company and the last time that The Marquardt Company generated any waste. Manifest number 91600058 shows 23 barrels of chrome acid being shipped out of the storage area (pumping truck) as of February 7, 1992. Trichloroethane is routinely recycled by The Marquardt Company by RhoChem. The statement that Mr. Brown made on May 27, 1992 to DTSC personnel was to the best of his knowledge true. EXHIBIT 5 also contains letters to both Marquardt Manufacturing and Kaiser Marquardt from The Marquardt Company's attorney, Mr. Philip Gustlin, stating that no hazardous waste was to be placed in The Marquardt Company's hazardous waste area. Mr Brown had no reason to suspect that anything had been put in the hazardous waste area from the February 13, 1992 date and thus his statements to DTSC personnel as to what the area contained were true to the best of his knowledge. However, on May 27, 1992 while touring the site with the DTSC personnel, Mr. Brown discovered that the hazardous waste storage area had been filled up with a number of containers of unknown contents, see Counts 3 and 4, deposited in this area by Kaiser Marquardt. (See Count 3)

PLEASE REMOVE THIS COUNT

COUNT 16: On May 27, 1992 DTSC arrived at the TMC facility. Mr Emmons Brown represents The Marquardt Company and only has control over those portions of the facility due to the lease back arrangements with Marquardt Manufacturing and Kaiser Marquardt. Each leasing agent has its own facility manager and Mr Brown has no authority to allow anyone inside



their leased premises. Mr. Brown did provide DTSC personnel with the name and phone number of the appropriate contact inside Kaiser Marquardt and Marquardt Manufacturing, allowing DTSC to make their own arrangements.

As to Mr. Brown's statement that he did not have a key to the hazardous waste storage area that is a correct statement. EXHIBIT 6 contains written and signed statements from Ken Walker, Head of Security for the entire facility stating that in fact records revealed that Mr. Brown was not in possession of the key to hazardous waste area and statements from Ken Scheurn, Nick Staves and Victor Castrano from Kaiser Marquardt stating that at no time were they asked who had a key to the area. At no time did Mr. Brown willfully prevent or interfere with or impede any DTSC personnel.

PLEASE REMOVE THIS COUNT

COUNT 17: We have contacted Marquardt Manufacturing and they related to us that they said to DTSC that they did not know what the waste was. EXHIBIT 7 is a signed statement from Marquardt Manufacturing stating that they did not say to DTSC personnel that The Marquardt Company had abandoned the waste on Marquardt Manufacturing leased property.

PLEASE REMOVE THIS COUNT

COUNT 18: We have no idea what the factual basis is for this count. On May 27, 1992 Mr. Emmons Brown made the statement that the hazardous waste storage area contained oily water waste and some contaminated soil. Upon arriving at the site with DTSC he discovered a number of other items in the enclosure (see Count 15). After DTSC's visit Mr. Brown contacted Kaiser Marquardt and got a list from them as to what they had put in the storage area. He then began the process of having the items shipped to a hazardous waste facility. He never made any false statements or representations. His statements to DTSC as to what was in the storage area were based on his last visit to the area and the fact that both leasing parties had been instructed on January 9, 1992 that they were NOT to put items in this area.



Between the May 27 and June 10 visits, waste was shipped out of the area on the attached manifests, EXHIBIT 8. When Victor Castrano began the labeling of the containers he used June 4 as the beginning accumulation as that was the day he began the labeling. We think that Count 15 and 18 are repeats of each other from a conversation that Mr. Brown had with DTSC personnel Martina Gutierrez, it was the June 4th date that seemed to be the problem. This was simply an effort on Victor's part to be as honest as he could since that was the day he put the label on. All of this material has been shipped out so it is a moot question, but Counts 3 and 4 adequately cover this which The Marquardt Company admits under those counts since the hazardous waste area is their responsibility so this count should be removed.

PLEASE REMOVE THIS COUNT.

COPIES TO:

SEE ATTACHED PAGE



THE MARQUARDT COMPANY

Ferranti International

Mr. Jim Shinehouse
President
Ferranti International Inc.
3750 Electronics Way
Lancaster, Pa. 17604-3040

Mr. Joseph Tamusaitis
President
The Marquardt Company
16555 Saticoy Street
Van Nuys, Calif. 91406

Mr. James R. Cutright
Acting Chief Counsel
Toxics Legal Office
Department of Toxic Substances Control
P.O. Box 806
Sacramento, Calif. 95812-0806

Ms. Mary Locke, Chief
Office of Local Enforcement
Department of Toxic Substances Control
P.O. Box 806
Sacramento, Calif. 95812-0806

Mr. Larry Matz
Acting Chief
HQ's Surveillance and Enforcement Branch
Department of Toxic Substances Control
P.O. Box 806
Sacramento, Calif. 95812-0806

Ms. Maria Kelly
Waste Compliance Branch (H-4-1)
U. S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, Calif. 94105

Mr. Anastacio Medina, Chief
Hazardous Waste Control Program
Los Angeles County Fire Department
2615 South Grand Avenue, 6th Floor
Los Angeles, Calif. 90007



Mr. Robert P. Ghirelli
Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, Calif. 91754-2156

Ms. Theodora Berger
Assistant Attorney General
Environmental Law Section
Department of Justice
300 South Spring Street
North Tower, 11th Floor
Los Angeles, Calif. 90013



THE MARQUARDT COMPANY

Ferranti International

September 2, 1992

Mr. James McCammon
Department of Toxic Substances Control
1405 N. San Fernando Blvd.
Suite 300
Burbank, Calif. 91504

I, Emmons Brown, do hereby certify that counts 3,4, and 8 of the Report of Violation and Schedule for Compliance dated August 12, 1992 have been corrected under code section cited in this notice. These were all corrected as of September 1, 1992.

Emmons Brown
The Marquardt Company
16555 Saticoy Street
Van Nuys, Calif. 91406



Department of Pollution Control and Ecology
P. O. Box 8913 Little Rock, Arkansas 72219-8913
Telephone 501-562-7444

FILE

1

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address		The Margaret Co. 16555 Satiloy St. Van Nuys CA, 91406		A. State Manifest Document Number AR- 511337	
4. Generator's Phone (818) 989-6400		B. State Generator's ID HAN036009127		C. State Transporter's ID PC 1153 H0640	
5. Transporter 1 Company Name Martin Ind. Pumping		6. US EPA ID Number ICAD001006128636		D. Transporter's Phone 805-251-3237	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID PC --- H ---	
9. Designated Facility Name and Site Address Rineco Chemical Industries 1007 Vulkan Rd Haskell Arkansas, 7205		10. US EPA ID Number ARID98110157870		F. Transporter's Phone	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol
a. Waste Combustible Liquid NOS (Methyl Ethyl Ketone, Cyclohexane) Combustible Liquid NA 1993		No.	Type		L. Waste No.
b. Hazardous Waste Solid NOS (Nitrochloroethane) ORM-E NA 9189		006DM	003B0	6	F001, D035 F005
c. Hazardous Waste Liquid NOS (Cadmium Chromium) ORM-E NA 9189		001DM	001.25	Y	F001
d. Waste Paint Related Material Flammable Liquid NA 1263		008DM	00200	6	D006, D007
J. Additional Descriptions for Materials Listed Above 1. A. Waste Nitrochloroethane mixture, App# 9206-2824 1. B. Contaminated Rags, App# 9206-2827 1. C. Ethylene Glycol and Oil, App# 9206-2825 1. D. Paint Waste, App# 9206-2826		K. Handling Codes for Wastes Listed Above EMERGENCY RESPONSE INFORMATION ERG-134 NA 27-11851 IX-26 11031 Emergency contact Victor Castano (818) 939-4100			
15. Special Handling Instructions and Additional Information Wear Appropriate Respirator and Protective Clothing					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name KENNETH J. SCHEURN		Signature		Month Day Year 10/6/1992	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Gregory J. McCase		Signature		Month Day Year 10/6/1992	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Michael Hudson					
Signature Michael Hudson					
Month Day Year 10/6/1992					

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

ARMED AND DANGEROUS - DO NOT APPROXIMATE

1007 MULDAN ROAD-HASSELL (CHIPPING)
P. O. BOX 115 (MAILING)
BENTON, AR. 71613
(501) 773-6036

CERTIFICATE OF DISPOSAL # 1319920701

This is to certify that 6 Containers(s) of waste materials
received from THE MARGARET CO. Co. Line 3,
Manifest # 13-1131 was disposed of in full
of regulation. This waste was further disposed
and complied with the 1990 contract of
incineration in full accordance with all applicable
Federal, State, local laws and regulations.

Signed: 

John Whitney

Title: Vice President of Regulation Services

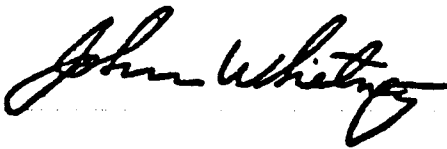
Date: 11/27/01

R I N E O O C H E M I C A L I N V E S T I G A T I O N

1000 VOLCAN ROAD-HASKELL (SHIPPING)
P. O. BOX 113 (MAILING)
BENTON, AR. 72015
(501) 773-5006

CERTIFICATE OF DISPOSAL # 1416620701

This is to certify that 1 Container(s) of waste materials
received from THE MARGARIT CO. on line 7
Manifest # AR-111187 was disposed at R.O. Fuller
by incineration. This material was incinerated
and the residue was placed in a landfill
and the residue was placed in a landfill
incineration is full accordance with all applicable
Federal, State, Local laws and regulations.


John Whitley

Fuller, Inc. President or Representative of Full

Date 08/12/07/01


R I N E O C C H E M I C A L I N D U S T R I E S

1007 VULCAN ROAD-HASSELL (SHIPPING)
P. O. BOX 110 (MAILING)
BENTON, AR. 71012
(501) 773-9333

CERTIFICATE OF DISPOSAL # 1818920701

This is to certify that 8 Containers of waste materials
received from THE MARGUERITE CO. on 11/1/71.
Material # AR-181103, was disposed of by full-
scale reclamation. This material was either distilled
and/or burned into fuels for power, and
incineration in full accordance with all applicable
Federal, State, local laws, and regulations.

By:



John Whitney

Title: Vice President of Regulatory Affairs

Date: 11/31/71

ARMED & DANGEROUS INSTRUCTIONS

1009 VULCAN ROAD-HASSELL (CHIPPING)
P. O. BOX 113 MAILING
BENTON, AR. 72015
(501) 773-5033

CERTIFICATE OF DISPOSAL # 1819910701

This is to certify that 4 Containers of waste materials
received from THE MARILYNDF 11, 12, 13, 14, 15
Manifest # AF-81,107 was disposed of in full
in accordance. This material was taken to the
and disposed into field for disposal
in full accordance with all applicable
Federal, State, local laws, and regulations.

3.1 
OUR OFFICE

Under the provisions of regulations...

Under the provisions...



MARTIN

INDUSTRIAL PUMPING INC./WASTE MANAGEMENT

June 11, 1992

Marquardt
16555 Saticoy St.
Van Nuys, Ca. 92715

Please destroy Manifest No. 92163870. It is being replaced by Manifest
No. 511337 due to disposal site acceptability.

Thank you,



Mike Reina, Operations Manager
Martin Industrial Pumping Inc.

MR:dt



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

Rineco

1007 Vulcan Rd - Haskell

P.O.Box 729

Benton, AR 72015

Phone (501) 778-9089 Fax (501) 778-7855

**LAND DISPOSAL RESTRICTION
NOTIFICATION FORM**Generator Name: THE MARGARET CO
Manifest Number: _____US EPA ID#: CA0044696102EPA Waste Codes D001, D006, D007, D035
F001, F003, F005Treatability Group
Non-Wastewater

<u>EPA Waste Codes Subcategory</u>	<u>Treatment Code</u>	<u>Treatment Standard</u>
<input checked="" type="checkbox"/> D001 High TOC Subcategory >10%	FSUBS,RORGS,INCIN	
_____ D001 Low TOC Subcategory <10%	DEACT	
_____ D001 Ignitable Compressed Gases	DEACT	
_____ D001 Oxidizers	DEACT	
_____ D002 Acid pH<2	DEACT	
_____ D002 Alkaline pH>12.5	DEACT	
<input checked="" type="checkbox"/> D004-D011 Non-wastewaters with heavy metals in mg/l:		268.41
<input type="checkbox"/> arsenic 5.0 <input type="checkbox"/> barium 100		
<input checked="" type="checkbox"/> cadmium 1.0 <input checked="" type="checkbox"/> chromium 5.0		
<input type="checkbox"/> lead 5.0 <input type="checkbox"/> mercury .20		
(Low mercury subcategory-less than 260 mg/kg)		
<input type="checkbox"/> Selenium 5.7 <input type="checkbox"/> Silver 5.0		
<input checked="" type="checkbox"/> F001-F005 Spent solvents non-waste waters; maximum constituent concentration in mg/l:		268.41
<input type="checkbox"/> acetone .59 <input type="checkbox"/> n-Butyl alcohol 5.0		
<input type="checkbox"/> carbon disulfide 4.81 <input type="checkbox"/> carbon tetrachloride .96		
<input type="checkbox"/> chlorobenzene .05 <input type="checkbox"/> cresols .75		
<input type="checkbox"/> cyclohexane .75 <input type="checkbox"/> 1,2 dichlorobenzene .125		
<input type="checkbox"/> ethyl acetate .75 <input type="checkbox"/> ethyl benzene .053		
<input type="checkbox"/> ethyl ether .75 <input type="checkbox"/> isobutanol 5.0		
<input type="checkbox"/> methanol .75 <input type="checkbox"/> methylene chloride .96		
<input checked="" type="checkbox"/> methyl ethyl ketone .75 <input type="checkbox"/> methyl isobutyl ketone .33		
<input type="checkbox"/> nitrobenzene .125 <input type="checkbox"/> pyridine .33		
<input type="checkbox"/> tetrachloroethane .05 <input type="checkbox"/> toluene .33		
<input checked="" type="checkbox"/> 1,1,1 trichloroethane .41 <input type="checkbox"/> trichloroethylene .091		
<input type="checkbox"/> trichlorofluoromethane .96 <input type="checkbox"/> xylene .15		
<input type="checkbox"/> 1,1,2 trichloroethane, 1,2,2 trifluoroethane .96		
<input type="checkbox"/> tetrachloroethylene .05		

<u>EPA Waste Codes, Subcategory</u>	<u>Treatment Code</u>	<u>Treatment Standard</u>
_____ K002, K003, K004, K005, K007, K008, K071 K084, K100, U032, U136, U144, U204, U145, U146		268.41
_____ K006 (Anhydrous)		268.41
_____ K006 (hydrated)		268.41
_____ F025 (Spent filters/aids & desiccant subcategory)		268.43
_____ F025 Light end subcategory		268.43
_____ F006, F019, K001, K015, K021, K022, K028, K048, K049, K050, K051, K052, K083, K086, K087, U051		268.41, 268.43
_____ K009, K010, K011, K013, K014, K016, K017 K018, K019, K020, K023, K024, K029, K030 K060, K073, K085, K093, K094, K095, K096, K097, K098, K099, K103, K104, K105		268.43
_____ U002, U003, U004, U005, U009, U012, U018, U019, U022, U024, U025, U027, U028, U029, U030, U031, U036, U037, U039, U043, U044, U045, U047, U048, U050, U052, U063, U066, U067, U068, U069, U070, U071, U072, U075, U076, U077, U078, U079, U080, U081, U082, U083, U084, U088, U101, U102, U105, U106, U107, U108, U111, U112, U117, U118, U120, U121, U127, U128, U130, U131, U137, U138, U140, U141, U142, U152, U155, U157, U158, U159, U161, U162, U165, U169, U170, U172, U174, U179, U180, U181, U183, U185, U187, U188, U190, U192, U196, U203, U207, U208, U209, U210, U211, U220, U225, U226, U227, U228, U235, U239, U240, U243		268.43
_____ K027, K113, K114, K115, K116	FSUBS, INCIN	268.42
_____ U008, U016, U053, U055, U056, U057, U058, U064, U085, U087, U089, U090, U094, U113, U122, U123, U124, U125, U126, U147, U154, U166, U182, U186, U197, U201, U213, U221, U248	FSUBS, INCIN	268.42
_____ U086, U098, U099, U103, U109, U160	FSUBS, CHOXD, CHRED, INCIN	268.42
_____ K025, K026, U001, U007, U010, U011, U014, U015, U017, U021, U026, U034, U035, U038, U041, U042, U046, U049, U059, U062, U073, U074, U091, U092, U093, U095, U097, U110, U114, U116, U119, U132, U143, U148, U149, U150, U153, U156, U163, U164, U167, U168, U171, U173, U176, U177, U178, U184, U191, U193, U194, U200, U202, U206, U218, U219, U222, U236, U237, U238, U244	INCIN	268.42

The waste identified is a restricted waste and does not meet the applicable treatment standards set forth in subpart D of this part or exceeds the applicable prohibitions levels set forth in 268.32 or RCRA 3004(d).

I hereby submit this notification form and to the best of my knowledge all information is correct.

Signature

Linnette H. Schum

Date

06/11/92



THE MARQUARDT COMPANY

Ferranti Defense & Space

EMERGENCY BUSINESS PLAN



AMENDMENT

KEY
INVENTORY

AMENDMENT FORM

CERTIFICATE OF DISCLOSURE OF HAZARDOUS SUBSTANCES

INSTRUCTIONS: DO NOT USE THIS FORM FOR A CHANGE IN THE BUSINESS LOCATION OR THE BUSINESS OWNER. AN INITIAL APPLICATION MUST BE SUBMITTED WHEN A BUSINESS MOVES TO A NEW LOCATION OR CHANGES OWNERSHIP. COMPLETE ALL ITEMS BELOW. TYPE OR PRINT NEATLY. MAIL THIS AMENDMENT FORM TO: LOS ANGELES CITY FIRE DEPARTMENT, HAZARDOUS MATERIALS SECTION, 200 NORTH MAIN STREET, ROOM 990-8, LOS ANGELES, CA. 90012.

LAFD # 025566-001-5 BUSINESS TAX ACCOUNT # 95-289-9128 FD BUS # 009138-4
 LEGAL NAME OF BUSINESS THE MARQUARDT COMPANY, INC. SIC CODE # 3471
 BUSINESS SITE ADDRESS 16555 W. SATICOY STREET UNIT # _____
 CITY VAN NUYS STATE CA ZIP 91406
 NAME OF BUSINESS OWNER FERRANTI INTERNATIONAL PHONE 717-285-7911
 NAME OF ON-SITE MANAGER Joseph Tamusaitis PHONE 818-989-6629
 PRIMARY EMERGENCY CONTACT Emmons Brown 24 HR EMERGENCY PHONE 818-989-6643
 ALTERNATE EMER. CONTACT TMC Security 24 HR EMERGENCY PHONE 818-989-6638
 DOING BUSINESS AS (DBA) _____ IN CARE OF _____
 BUSINESS MAILING ADDRESS 16555 SATICOY STREET, VAN NUYS, CA 91406
 NAME OF PROPERTY OWNER THE MARQUARDT COMPANY
 MAILING ADDRESS 16555 W. SATICOY STREET, VAN NUYS, CA 91409 PHONE _____
 LIST ALL ADDITIONAL SITE ADDRESSES THAT MAY BE USED TO REPORT AN EMERGENCY _____

BRIEFLY DESCRIBE HOW HAZARDOUS MATERIALS ARE USED IN YOUR BUSINESS TMC is now in the lease business.
Will apply for closure of four hazardous waste treatment sites. No manufacturing or
purchase of any hazardous materials will take place.

PERMIT NUMBER


PERMIT INFORMATION
 IF YOUR BUSINESS HAS
 A PERMIT ISSUED FOR
 HAZARDOUS SUBSTANCES
 OR WASTES, LIST THE
 PERMIT NUMBER.

- A. L.A. FIRE DEPT. (FIRE PERMIT)
- B. L.A. BUREAU OF SANITATION (INDUSTRIAL WASTE)
- C. SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
- D. STATE HEALTH SERVICES (RADIOACTIVE MAT'L LICENSE)
- E. L.A. COUNTY HEALTH DEPT. (GENERATORS HAZARDOUS WASTE)
- F. E.P.A. IDENTIFICATION NO. (GENERATORS HAZARDOUS WASTE)
- G. E.P.A. IDENTIFICATION NO. (HAZARDOUS WASTE HAULER)
- H. E.P.A. IDENTIFICATION NO. (HAZARDOUS WASTE FACILITY-TSD)
- I. REGIONAL WATER QUALITY CONTROL BOARD
- J. CAL-OSHA (CARCINOGEN REGISTRATION)
- K. OTHER AGENCY (SPECIFY) _____

SEE ATTACHMENT
SEE ATTACHMENT
0
0
0
0
0
0
0
0
0
0

IT IS UNLAWFUL FOR ANY PERSON TO KNOWINGLY VIOLATE ANY PROVISION OF THIS ORDINANCE. I CERTIFY UNDER PENALTY OF PERJURY, THAT THE ABOVE INFORMATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE. I AGREE TO COMPLY WITH ALL REGULATIONS, LAWS AND ORDINANCES PERTAINING TO OR RELATING TO THE ABOVE BUSINESS THAT ARE NOW IN EFFECT OR THAT MAY BE HEREAFTER ADDED.

SIGNATURES MUST BE INCLUDED.

 Director
Facilities 4/2/94
 SIGNATURE OF BUSINESS OWNER OR AUTHORIZED REPRESENTATIVE/TITLE/ DATE

SAME AS ABOVE

SIGNATURE OF ON-SITE MANAGER

DATE

FOR OFFICE USE ONLY:

RECEIVED BY INIT. _____

DATE _____

INSPECTORS I.D. _____

LAFD SIGNATURE _____

DATE _____

MASTER CODE _____

VERIFIED _____

DATA ENTRY INIT. _____

DATE _____

EMERGENCY PROCEDURES FOR HAZARDOUS WASTE AREA

A. Contingency Plan

1. Content

a. Actions to be taken -

- (1) Fires - use fire extinguisher in hazardous waste area to extinguish fire. If unsuccessful, call x6509 - Security.
- (2) Explosions - evacuate area, call x6509
- (3) Unplanned release of waste, call x6343 - Environmental Analyst, will determine if release is a reportable quantity and report to:

- (a) air - call SCACMD (818) 762-2033
- (b) soil - call DHS (213) 744-3223
- (e) surface water - National Response Center (1-800-) 424-8802

- (f) California State Office of Emergency Services (1-800) 852-7550

- (g) City of Los Angeles - Industrial Waste Water (213) 485-5896 or (213) 485-5872

- (h) L.A. City Fire Department (213) 485-8080

- (i) L.A. City Fire Department Van Nuys (818) 989-6561

b. Arrangements agreed to by the following authorities:

- (1) Local police 911

- (2) Fire Department 911 - Van Nuys Fire Department has toured facility and became familiar with locations, types and quantities of hazardous waste

EXHIBIT IV

- h. Material safety data sheets - note hazardous waste is exempt from Hazard Communication Standard - CFR 29-1910.1200(i). However, MSDS's on new materials purchased by the company which are eventually transformed into hazardous waste are available in the Hazardous Waste Office, Bldg 2.
- i. Monitoring equipment - Drager pump and tubes. Hazardous Waste Office.
HAZCATTM Kit - hazardous waste storage area
- 2. Emergency equipment:
 - a. Telephones: Hazardous waste storage
Bldg 101 treatment area
Bldg 109 treatment area
 - b. Warning alarm: PA system
 - c. Safety showers and eye wash:
Hazardous Waste Storage
Bldg 101 treatment area
Bldg 109 treatment area
 - e. First aid: Nurse, Bldg 6
 - f. Fire extinguishers:
Hazardous Waste Storage - 1 ABC
1 CO₂ - BCD
Bldg 101 - 2 ABC
Bldg 109 - 2 ABC
- 3. Schedule for maintaining:
 - a. Phones - used daily
 - b. PA system - used daily
 - c. Showers and eyewash - test 1X/month
 - f. Fire extinguishers - refilled 1X/yr. or after every use
 - k. Personal protective equipment is cleaned and checked after each use
- D. Security Measures:
 - 1. Access control - 24 hr surveillance and security guards - only person with appropriate badge can enter facility. Only person with key can enter Hazardous Waste Storage area.
 - 2. Gates - unattended are locked
 - 3. Barriers - the facility is fenced. The Hazardous Waste Area within the facility is fenced.



4. Warning signs - located on fence - Hazardous Waste Storage Area, "CAUTION: HAZARDOUS WASTE AREA - UNAUTHORIZED PERSONS KEEP OUT", and "CUIDADO! ZONA DE RESIDUOS POLIGROSOS, PROHIBIDA LA ENTRADA A PERSONAS NO AUTORIZADAS"
- E. Artificial lighting -
 1. Hazardous waste storage area
1 - Mercury vapor lamp - pole - 30'
 2. Bldg 101 - 2 Mercury vapor lamp - pole 30'
 3. Bldg 109 - fluorescent lighting
- F. Water Supply - City Water - available at Hazardous Waste Area
Bldg 101
Bldg 109
- G. Water supplies have backflow protection devices:
 1. Types of devices
 2. Locations - See Appendix 8

VII. FACILITY EQUIPMENT AND DEVICES

A. Waste Handling Equipment

1. Forklift - no safety features
2. Pumps - 2 drum pumps
 - 1 air pump for flammables
 - 1 vacuum pump for small spills
 - 1 1/2" diaphragm pump for corrosive materials
 - 2 1" diaphragm pumps for filter presses
 - 1 200 Gal sump sucker for machine oil/coolant and emergency spill cleanup

B. Equipment for safety loading hazardous waste onto vehicles - none. This is done by the individual haulers.

C. Safety and emergency equipment to be used by hazardous waste personnel:

1. Personal protective equipment:

a. Respirators - full face - 2
Respirators - half face - canisters for acid gas/organic vapors and asbestos.
Quantity: 4
Stored in Hazardous Waste Storage Area

b. Self-contained breathing apparatus:
Quantity: 2
Stored in Safety Office - Bldg 3 and
Test Safety Office - Bldg 26

c. Goggles - 2
Faceshield - 4
Stored in Hazardous Waste Storage Area

d. Boots - 1 pair PVC
Stored in Hazardous Waste Storage Area .

e. Coveralls - 8 pair - Locker Bldg 94, polyester/cotton

f. Gloves: Heavy duty Neoprene - 2 pair
Heavy duty Latex - 4 pair
Disposable Latex - 1 box
Stored in Hazardous Waste Storage Area

g. Spill Units - 2 coated tyvek
1 "CHEMREL"
Stored in Hazardous Waste Storage Area



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EXHIBIT V



THE MARQUARDT COMPANY

Ferranti Defense & Space

HAZARDOUS WASTE INSPECTION RECORD

ISD CADO44696102

NAME Victor
DATE 12-30-91
TIME 9:15 AM

WEEKLY CHECK LIST:

I. CONTAINER STORAGE

AREA:

CONDITION OF AREA	YES	NO	COMMENTS
(a) BARRELS IN FRONT		✓	
(b) HOSES ROLLED	✓		
(c) FIRE EXTINGUISHER CHARGED	✓		
(d) SPILLS		✓	
(e) LEAKING DRUMS	✓	✓	
(f) SPILL CONTAINMENT INTACT	✓		
(g) GATE LOCKED	✓		
(h) SUPPLIES NEEDED:			

ABSORBENT	_____	FACE SHIELD	_____
OVER PACK DRUMS	_____	BOOTS	_____
WASTE LABELS	✓	GLOVES	_____
NEW EMPTY DRUMS	✓	RESPIRATORS	✓
		CANISTERS	✓

WASTE INVENTORY	NUMBER OF DRUMS
(a) ACID <u>Acid And Water</u>	3 / 1
(b) CAUSTIC	2
(c) PHOTO LAB CHEMICALS	2
(d) ALCOHOL (INCLUDING OPA) <u>Isopropyl Alcohol</u>	2 / 15
(e) THINNER	2
(f) LACQUER PAINT	1
(g) EPOXY RESIN	1
(h) CHROMIC HYDROXIDE <u>Chromic Acid</u>	2 / 23
(i) OIL <u>Isopropyl Alcohol</u>	3 / 17
(j) 1,1,1 - TRICHLOROETHANE <u>1,1,1 Trichloroethane</u>	14 / 1
(k) TRICHLOROTRI FLUOROETHANE	2
(l) METHYLENE CHLORIDE	2
(m) OTHER <u>LAB DRUMS</u>	2

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's LEPA ID No.

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

MARGUERITE CO.
6555 Saticoy St.
Van Nuys, CA 91409

4. State Manifest Document Number

31600058

4. Generator's Phone

818-989-5717

5. State Generator's ID

6. State Generator's ID

5. Transporter 1 Company Name

A. LEPA ID Number

WORTH TAD PUMPING

B. LEPA ID Number

7. Transporter 2 Company Name

A. LEPA ID Number

8. Designated Facility Name and Site Address

10. LEPA ID Number

CHEM TECH SYSTEMS
3600 E. 16th St.
Norwalk, CA 90002

B. LEPA ID Number

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

13. Total Quantity

14. Unit Weight

HAZARDOUS WASTE LIQUID N.O.S.
(Chromic) ORN-E-NA 9189

No.

Type

Quantity

Unit Weight

15. Additional Descriptions for Materials Listed Above

16. Handling Codes for Materials Listed Above

16. Special Handling Instructions and Additional Information

E.R.G. Pg 21 24 hr Emergency Response # 805-251-8737

Use Appropriate Respirator and Protective Clothing

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this assignment are fully and accurately described above by proper shipping name and are classified, posted, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Month Day Year

VICTOR E. CASTAÑO

Victor E. Castano

02/20/79/12

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

Rafael R. R. R.

Rafael R. R. R.

02/21/79/12

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

Signature

Month Day Year

T. Honda

T. Honda

02/21/79/12

DO NOT WRITE BELOW THIS LINE

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-6802. WITHIN CALIFORNIA, CALL 1-800-852-7550

LAW OFFICES

GUSTLIN, GOLOS & BRAGIN
AN ASSOCIATION INCLUDING A PROFESSIONAL CORPORATION

DENNIS E. GOLOS
PHILIP R. GUSTLIN
A PROFESSIONAL CORPORATION
RONALD A. BRAGIN
MICHAEL K. MCMILLAN
ALBERT L. SASSOE, JR.
JILL A. THOMAS
KATHLEEN M. FUNG
ROBERT A. ERIC

THE WILSHIRE LANDMARK BUILDING
11755 WILSHIRE BOULEVARD
SUITE 1400
LOS ANGELES, CALIFORNIA 90025-1520
(213) 477-1050

TELECOPIER NUMBER
(213) 477-8531

OF COUNSEL
MARTIN H. BLANK, JR.
RICHARD M. ACKESON

FILE NUMBER
914-59-1
5001.4

January 9, 1992

VIA FACSIMILE: (818) 909-6869

Kenneth E. Woodgrift, President
Marquardt Manufacturing, Inc.
16621 Saticoy Street
Van Nuys, California 91409-9104

Re: Storage of Hazardous Waste

Dear Ken:

Due to the sale of the Ordnance business at The Marquardt Company ("TMC") to Marquardt Manufacturing, Inc. ("MMI"), with facilities leased by MMI from TMC, it is imperative that MMI be in compliance with the California Regulatory Codes for the storage of hazardous waste. All hazardous waste generated by MMI must be stored only on the portion of the facility leased by MMI.

As a generator of hazardous waste, MMI may accumulate hazardous waste on its leased facility for 90 days or less without a permit (California Code of Regulations ("CCR") §22-66262.34) provided that the conditions of the CCR's are complied with by MMI. I have attached the pertinent code sections which begin with §22-66262.10 through §22-66262.43. The reference on the top of page 820, to "Article 9 of Chapter 15 of this division" is §22-66265.170 through 22-66265.177 which I have also attached.

No hazardous waste generated by MMI may be stored anywhere on the Marquardt property except on MMI's leased portion of the property and the storage must meet all applicable California and Federal statutes and regulations.


GUSTLIN, GOLOB & BRAGIN

Kenneth E. Woodgrift
January 9, 1992
Page 2

If you have any questions on this, please feel free to call.

Very truly yours,

GUSTLIN, GOLOB & BRAGIN

A handwritten signature in dark ink, appearing to read 'Philip R. Gustlin', with a long, sweeping horizontal line extending to the right.

PHILIP R. GUSTLIN

PRG/der
Attachment

cc: Joseph Tamusaitis
Jim Shinehouse
John McNally

LAW OFFICES

GUSTLIN, GOLOB & BRAGIN
AN ASSOCIATION INCLUDING A PROFESSIONAL CORPORATION

THE WILSHIRE LANDMARK BUILDING

11755 WILSHIRE BOULEVARD

SUITE 1400

LOS ANGELES, CALIFORNIA 90025-1520

(213) 477-1080

DENNIS E. GOLOB
PHILIP R. GUSTLIN
A PROFESSIONAL CORPORATION
RONALD A. BRAGIN
MICHAEL K. McMILLAN
ALBERT L. SASSOE, JR.
JILL A. THOMAS
KATHLEEN M. FUNG
ROBERT A. ERIC

TELECOPIER NUMBER
(213) 477-8831

OF COUNSEL
MARTIN H. BLANK, JR.
RICHARD M. ACHESON

FILE NUMBER
914-59-1
5001.4

January 9, 1992

VIA FACSIMILE: (818) 785-9646

Mr. Terry McDowell
President
Kaiser Marquardt, Inc.
16555 Saticoy Street
Van Nuys, California 91409-9104

Re: Storage of Hazardous Waste

Dear Terry:

Due to the sale of the Propulsion business at The Marquardt Company ("TMC") to Kaiser Marquardt, Inc. ("Kaiser"), with facilities leased by Kaiser from TMC, it is imperative that Kaiser be in compliance with the California Regulatory Codes for the storage and treatment of hazardous waste. All hazardous waste generated by Kaiser must be stored only on the portion of the facility leased by Kaiser.

This means that the fenced hazardous waste storage area west of building 95, commonly referred to as building 111, is no longer available to Kaiser to store hazardous waste since this area is not on the portion of the property leased by Kaiser. The keys to this area are currently in the possession of Victor Castano and Victor should turn these keys over to Joe Tamusaitis.

A new area for hazardous waste storage inside the Kaiser-Marquardt leased facility should be designated by Kaiser. No hazardous waste from Kaiser will be accepted in the 111 facility after January 13, 1992.

As a generator of hazardous waste, Kaiser may accumulate hazardous waste on its leased facility for 90 days or less without a permit (California Code of Regulations ("CCR") §22-66262.34) providing that the conditions of the CCR's are complied with by Kaiser. I have attached the pertinent code sections which begin with §22-66262.10 through 22-66262.43.

GUSTLIN, GOLOB & BRAGIN

Mr. Terry McDowell
January 9, 1992
Page 2

The reference on the top of page 820, to "Article 9 of Chapter 15 of this division" is §22-66265.170 through §22-66265.177 which I have also attached.

No hazardous waste generated by Kaiser may be stored anywhere on the Marquardt property except on Kaiser's leased portion of the property and the storage must meet all applicable California and Federal statutes and regulations.

If you have any questions on this, please feel free to call.

Very truly yours,

GUSTLIN, GOLOB & BRAGIN



PHILIP R. GUSTLIN

PRG/der

cc: Joe Tamusaitis
Jim Shinehouse
Al Stein
Jim Dutton
Victor Castano

KAISER MARQUARDT

To: File

August 18, 1992

From: Ken Walker *Ken Walker*

Subject: Marquardt Company Key to Hazardous Waste Area

CC: E. Brown, J. Tamusaitis

After a thorough investigation I conclude that Emmons Brown was not in physical custody of a key that would open the Hazardous Waste Area gate for the EPA inspection team. At that time, Mr. Brown was positive that he did not have a master key that would open the subject area. I confirmed this when I inspected his keys and conducted a subject interview. After a two day search and investigation, reviewing all physical evidence and lock records, I conclude that Emmons Brown was not issued a key specified for the Hazardous Waste Area.

Mr. Brown eventually located a master key in an envelope in his file cabinet, several weeks later. The envelope was mislabeled "Bldg 28". Mr. Brown had no reason to believe that the key in an envelope labeled "Bldg 28" would open the waste area.

During the EPA inspection, he was unable to unlock the area for the inspection team.

TO: Emmons Brown

27 August 1992

FROM: Ken Scheurn ~~AB~~

SUBJECT: Marquardt Company Hazardous Waste Area Keys, Possession of


COPIES: A. Stien, R. Surynt

The following is in answer to your question; Did I, during the recent EPA Hazardous Waste Operation audits (06/03 and 06/10/92) make a statement or hear anyone else make a statement to EPA personnel that Victor Castano, You and I all had keys to the Marquardt Company hazardous waste area?

1. I have never had possession of a key to the subject area.
2. I did not make such a statement.
3. I did not heard anyone else make that statement.
4. To best of my recollection the question was not brought up during my presence.

If I were to have been asked the question, I would have had to answer; Victor has a key, I do not have a key, and I don't know if Emmons has a key or not.

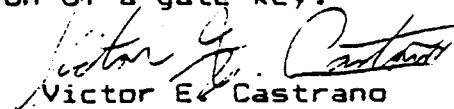
**KAISER MARQUARDT
INTEROFFICE MEMORANDUM**

DATE: August 28, 1992
TO: E. BROWN
FROM: N. STAVES 
SUBJECT: KM FACILITY INSPECTION BY EPA ON JUNE 3, 1992
COPIES: R. SURYNT, FILE

I was not asked by any member of the EPA Inspection Team who had keys to the TMC hazardous waste storage area. To my knowledge (while I was with the group) no one was asked for this information.

To whom it may concern:


I Victor Castano declare that to the best of my knowledge I have no recollection of any questions directed at me by the EPA inspectors regarding other employees possession of a gate key.


Victor E. Castrano
August 27, 1992

August 31, 1992

TO WHOM IT MAY CONCERN:

At no time, to the best of our knowledge, during the D.T.S.C. inspection on June 10, 1992 was The Marquardt Company accused of abandoning waste on M.M.I. leased land by M.M.I. personnel.



Joseph Pospichal

John McNally

EXHIBIT VIII

Please print or type. Form designed for use on elite (12-pitch typewriter).

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD044696142		Manifest Document No. 1		2. Page 1 of 1		Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address MARQUARDT Corp 1555 SATICUM VAN Nuys CA 11501				A. State Manifest Document Number 307-3781			
4. Generator's Phone 51469				B. State Generator's ID			
5. Transporter 1 Company Name FRICKER INC		6. US EPA ID Number CAD009466392		C. State Transporter's ID 5273		D. Transporter's Phone 714/355-5601	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone	
9. Designated Facility Name and Site Address Gibson Refinery 401 Central Ave Wilmington Co				10. US EPA ID Number 90741 CAD981455466		G. State Facility's ID 14A981455466	
				H. Facility's Phone (313) 549-9117			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Waste Combust. Liq. Liquid N.O.S UN 1993				12. Containers No. Type 001 TV 1993		13. Total Quantity 1993	
				14. Unit Wt./Vol		1. Waste No. State 241 EPA/Other	
						State EPA/Other	
						State EPA/Other	
						State EPA/Other	
J. Additional Descriptions for Materials Listed Above Waste SE 909 FUEL 1-547 SOLVENT 1-570 R-1# 12/67				K. Handling Codes for Wastes Listed Above a. 01 b. c. d.			
15. Special Handling Instructions and Additional Information Lab # 31957 20 hr Contact Elevated Temp 120-140 F Toxic - Irritant - Corrosive - Flammable - Volatile							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good-faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name Edward D.				Signature [Signature]		Month Day Year 10/1/75	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name [Signature]				Signature [Signature]		Month Day Year 10/1/75	
18. Transporter 2 Acknowledgement of Receipt of Materials							
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19. Discrepancy Indication Space							
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name [Signature]				Signature [Signature]		Month Day Year 10/1/75	

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 IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550
 GENERATOR
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 FACILITY

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IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802. WITHIN CALIFORNIA, CALL 1-800-852-7550

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address THE HAWKWOODS TRADING COMPANY		4. Generator's Phone (916) 989-6717		5. Transporter 1 Company Name HAZARDON HULL CORP INC		6. US EPA ID Number 161201014217436			
7. Transporter 2 Company Name		8. US EPA ID Number		9. Designated Facility Name and Site Address CALIFORNIA ASBESTOS MONOFILL		10. US EPA ID Number 1611100000277411			
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) HAZARDOUS SUBSTANCE SOLID ORM-C A2A 9187		12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol			
a. HAZARDOUS SUBSTANCE SOLID ORM-C A2A 9187		471 BIA		00.125		4			
b.									
c.									
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15. Special Handling Instructions and Additional Information EMERGENCY CONTACT 805-277-3722 SEE APPROPRIATE DISTRICTS WITHIN 1/4 MILE RADIUS									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of the consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable federal, state and international laws. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name VICTOR E CASTAÑO		Signature <i>[Signature]</i>				Month Day Year 01/09/92			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name STEVE DOWNING		Signature <i>[Signature]</i>				Month Day Year 01/09/92			
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature				Month Day Year			
19. Discrepancy Indication Space									
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name CLIFTON E. HINTON									
Signature <i>[Signature]</i>		Month Day Year 01/16/92							

DO NOT WRITE BELOW THIS LINE.

Yellow: TSDf SENDS THIS COPY TO GENERATOR WITHIN 30 DAYS.
(Generators who submit hazardous waste for transport out-of-state, produce completed copy of this copy and send to DTSC within 30 days.)

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1

Information in the shaded areas
is not required by Federal law.

3. Generator's Name and Mailing Address

A. State Manifest Document Number

92163878

4. Generator's Phone

B. State Generator's ID

5. Transporter 1 Company Name

6. US EPA ID Number

C. State Transporter's ID

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

9. Designated Facility Name and Site Address

10. US EPA ID Number

G. State Facility's ID

H. Facility's Phone

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

13. Total
Quantity

14. Unit
Wt/Vol

I. Waste Number

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IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

GENERATOR
TRANSPORTER
FACILITY

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address E. MAX TRANSPORTATION CO 10550 SW 24th Ave Miami, FL 33156		4. US EPA ID Number 91870816659		A. State Manifest Document Number 92163869	
4. Generator's Phone ()		5. Transporter 1 Company Name E. MAX TRANSPORTATION CO		B. State Generator's ID HIAHQ36-10091071	
5. Transporter 1 Company Name		6. US EPA ID Number		C. State Transporter's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone ()	
9. Designated Facility Name and Site Address		10. US EPA ID Number		E. State Transporter's ID	
				F. Transporter's Phone ()	
				G. State Facility's ID	
				H. Facility's Phone ()	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. 118) OIL RES. PFA. TANK - AL SEAMINGS; APP# 92-1168		1	1		State 352 EPA/Other F003
b. 115) CONTAMINATED SOIL; APP# 92-1173		1	1		State 217, 352 EPA/Other F003, F005
c.					State EPA/Other
d.					State EPA/Other
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
118) OIL RES. PFA. TANK - AL SEAMINGS; APP# 92-1168		a. 99		b. 99	
115) CONTAMINATED SOIL; APP# 92-1173		c. 99		d. 99	
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of the consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable federal, state and international laws.					
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Printed/Typed Name		Signature		Month Day Year	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Month Day Year	

DO NOT WRITE BELOW THIS LINE.

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1

Information in the shaded areas
is not required by Federal law.

3. Generator's Name and Mailing Address

A. State Manifest Document Number

4. Generator's Phone ()

B. State Generator's ID

5. Transporter 1 Company Name

6. US EPA ID Number

C. State Transporter's ID

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

10. US EPA ID Number

G. State Facility's ID

H. Facility's Phone

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

13. Total Quantity

14. Unit Wt/Vol

I. Waste Number

Waste corrective liquid NO.

No.

Type

State

EPA/Other

State

EPA/Other

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EPA/Other

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EPA/Other

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

HAZARDOUS PHOSPHORIC ACID

a.

b.

c.

d.

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of the consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable federal, state and international laws.

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Printed/Typed Name

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Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

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Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

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Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

DO NOT WRITE BELOW THIS LINE.

Information in the shaded areas
is not required by Federal law.

Below: GENERATOR SET LINES

RECORDS SEPARATOR PAGE

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STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

In the Matter of:) Docket HWCA 92/93-031
)
Marquardt Manufacturing, Inc.) CONSENT AGREEMENT AND ORDER
16621 Saticoy Street)
Van Nuys, California 91406)
) Health and Safety Code
Respondent.) Section 25187 and 25189.2

INTRODUCTION

1.1. Parties. The State Department of Toxic Substances Control (Department) issues this Consent Agreement and Order (Order) to Marquardt Manufacturing, Inc. (Respondent).

1.2. Site. Respondent generates, handles, treats, stores, and/or disposes of hazardous waste at the following site: 16621 Saticoy Street, Van Nuys, California 91406-2837 (Site).

1.3. Permit/Interim Status. The Respondent does not have a state permit, certificate, registration, or interim status to manage hazardous waste. The Respondent generates the following hazardous waste: coolants and chromic acid from rinse tanks.

1.4. Jurisdiction. Section 25187 of the Health and Safety Code (HSC) authorizes the Department to order corrective action and assess a penalty when the Department determines that any person has violated specified provisions of the Health and Safety Code or any permit, rule, regulation, standard, or requirement issued or adopted pursuant thereto. HSC sections 25187 and 25189.2 authorize the Department to impose an administrative penalty on persons who commit specified acts, pursuant to the

1 procedures set forth in HSC section 25187.

2 1.5. Exhibits. All exhibits attached to this Order are
3 incorporated herein by this reference.

4 1.6. Applicable Statutes and Regulations. Copies of the
5 statutes and regulations applicable to this Order are attached as
6 Exhibit (1).

7 DETERMINATION OF VIOLATIONS

8 2. The Department has determined, and the Respondent admits
9 that:

10 2.1. The Respondent violated title 22, California Code of
11 Regulations (Cal. Code Regs.), section 66265.16, subdivision (d)
12 (1) & (2) in that on or about June 10, 1992, Respondent failed to
13 maintain the following information related to hazardous waste
14 management:

15 (1) Job titles for each position and name of the employees
16 filling each job;

17 (2) Written job descriptions for each position.

18 2.2 The Respondent violated title 22, Cal. Code Regs.,
19 section 66265.16, subdivision (a)(3) in that on or about June 10,
20 1992, Respondent failed to ensure that the training program
21 attended by facility personnel is designed to ensure that
22 facility personnel are able to respond effectively to emergencies
23 by familiarizing them with emergency procedures, emergency
24 equipment, and emergency systems.

25 2.3 The Respondent violated title 22, Cal. Code Regs.,
26 section 66265.52, subdivision (d) in that on or about June 10,
27 1992, Respondent failed to name the primary emergency coordinator

1 and an alternate emergency coordinator in its contingency plan.

2 2.4. The Respondent violated title 22, Cal. Code Regs.,
3 section 66265.52, subdivision (g) in that on or about June 10,
4 1992, Respondent failed to include in its contingency plan the
5 current telephone number for the State Office of Emergency
6 Services.

7 2.5. The Respondent violated title 22, Cal. Code Regs.,
8 section 66265.53, subdivision (b) in that on or about June 10,
9 1992, Respondent failed to submit copies of its contingency plan
10 to the State Office of Emergency Services and local Police
11 Departments.

12 2.6. The Respondent violated title 22, Cal. Code Regs.,
13 section 66265.52, subdivision (f) in that on or about June 10,
14 1992, Respondent failed to include in its contingency plan an
15 evacuation plan for facility personnel.

16 2.7. The Respondent violated title 22, Cal. Code Regs.,
17 section 66265.52, subdivision (e) in that on or about June 10,
18 1992, Respondent failed to include in its contingency plan a list
19 of all emergency equipment at the facility, the location, and a
20 physical description of each item on the list, and its
21 capabilities.

22 2.8. The Respondent violated title 22, Cal. Code Regs.,
23 section 66265.173, subdivision (a) in that on or about June 10,
24 1992, Respondent failed to maintain containers closed at all
25 times, except when adding or removing waste.

26 2.9. The Respondent violated title 22, Cal. Code Regs.,
27 section 66262.34, subdivision (f)(1) in that on or about June 10,

1 1992, Respondent failed to clearly mark and make visible for
2 inspection on each container the date upon which each period of
3 accumulation begins.

4 2.10. The Respondent violated title 22, Cal. Code Regs.,
5 section 66265.35 in that on or about June 10, 1992, Respondent
6 failed to maintain aisle space in the hazardous waste storage
7 area to allow the unobstructed movement of personnel, fire
8 protection equipment, spill control equipment, and
9 decontamination equipment in an emergency.

10 SCHEDULE FOR COMPLIANCE

11 3. In that the Department and Respondent have agreed to the
12 entry of this Consent Agreement and Order, and based upon the
13 foregoing DETERMINATION OF VIOLATIONS, IT IS HEREBY ORDERED THAT:

14 3.1.1. Effective immediately, Respondent shall maintain at
15 the facility and submit to the Department the following
16 information related to hazardous waste management:

17 (1) Job titles for each position and name of the employees
18 filling each job;

19 (2) Written job descriptions for each position.

20 3.1.2. Effective immediately, Respondent shall ensure that
21 the training program attended by its facility personnel ensures
22 that facility personnel are able to respond effectively to
23 emergencies by familiarizing them with emergency procedures,
24 emergency equipment and emergency systems.

25 3.1.3. Effective immediately, Respondent shall list in its
26 contingency plan which person is the primary emergency
27 coordinator and which is the alternate emergency coordinator.

1 3.1.4. Effective immediately, Respondent shall list in its
2 contingency plan the telephone number of the State Office of
3 Emergency Services.

4 3.1.5. Effective immediately, Respondent shall submit
5 copies of its contingency plan to the State Office of Emergency
6 Services and Local Police Departments.

7 3.1.6. Effective immediately, Respondent shall include in
8 its contingency plan an evacuation plan for facility personnel
9 where there is a possibility that evacuation could be necessary.

10 3.1.7. Effective immediately, Respondent shall include in
11 its contingency plan a list of all emergency equipment, its
12 location, and a physical description of each item on the list and
13 a brief outline of its capabilities.

14 3.1.8. Effective immediately, Respondent shall clearly mark
15 on each container and make visible for inspection the date upon
16 which each period of accumulation begins.

17 3.1.9. Effective immediately, Respondent shall maintain
18 aisle space in the hazardous waste storage area to allow the
19 unobstructed movement of personnel, fire protection equipment,
20 spill control equipment and decontamination equipment in an
21 emergency.

22 3.2. Submittals. All submittals from a Respondent pursuant
23 to this Order shall be sent simultaneously to:

24 Florence Pearson
25 Branch Chief
26 Department of Toxic Substances Control
27 1405 N. San Fernando, Blvd., Suite 300
 Burbank, California 91504

27 //

1 Robert P. Ghirelli
2 Executive Officer
3 Regional Water Quality Control Board
4 Los Angeles Region
5 101 Centre Plaza Drive
6 Monterey Park, California 91754-2156

7 Anastacio Medina, Chief
8 Hazardous Waste Control Program
9 2615 South Grand Avenue, 6th Floor
10 Los Angeles, California 90007

11 3.3. Communications. All approvals and decisions of the
12 Department made regarding submittals and notifications will be
13 communicated to Respondent in writing by the Regional
14 Administrator, Department of Toxic Substances Control, or his/her
15 designee. No informal advice, guidance, suggestions, or comments
16 by the Department regarding reports, plans, specifications,
17 schedules, or any other writings by Respondent shall be construed
18 to relieve Respondent of the obligation to obtain such formal
19 approvals as may be required.

20 3.4. Department Review and Approval. If the Department
21 determines that any report, plan, schedule, or other document
22 submitted for approval pursuant to this Order fails to comply
23 with the Order or fails to protect public health or safety or the
24 environment, the Department may:

25 a. Modify the document as deemed necessary and approve
26 the document as modified or

27 b. Return the document to Respondent with recommended
changes and a date by which Respondent must submit to the
Department a revised document incorporating the recommended
changes.

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1 3.5. Compliance with Applicable Laws: Respondent shall
2 carry out this Order in compliance with all local, State, and
3 federal requirements, including but not limited to requirements
4 to obtain permits and to assure worker safety.

5 3.6. Endangerment during Implementation: In the event that
6 the Department determines that any circumstances or activity
7 (whether or not pursued in compliance with this Order) are
8 creating an imminent or substantial endangerment to the health or
9 welfare of people on the site or in the surrounding area or to
10 the environment, the Department may order Respondent to stop
11 further implementation of this Order for such period of time as
12 needed to abate the endangerment. Any deadline in this Order
13 directly affected by a Stop Work Order under this section shall
14 be extended for the term of the Stop Work Order.

15 3.7. Liability: Nothing in this Order shall constitute or
16 be construed as a satisfaction or release from liability for any
17 conditions or claims arising as a result of past, current, or
18 future operations of Respondent. Notwithstanding compliance with
19 the terms of this Order, Respondent may be required to take
20 further actions as are necessary to protect public health or
21 welfare or the environment.

22 3.8. Site Access: Access to the site shall be provided at
23 all reasonable times to employees, contractors, and consultants
24 of the Department, and any agency having jurisdiction. Nothing
25 in this Order is intended to limit in any way the right of entry
26 or inspection that any agency may otherwise have by operation of
27 any law. The Department and its authorized representatives shall

1 have the authority to enter and move freely about all property at
2 the Site at all reasonable times for purposes including but not
3 limited to: inspecting records, operating logs, and contracts
4 relating to the Site; reviewing the progress of Respondent in
5 carrying out the terms of this Order; and conducting such tests
6 as the Department may deem necessary. Respondent shall permit
7 such persons to inspect and copy all records, documents, and
8 other writings, including all sampling and monitoring data, in
9 any way pertaining to work undertaken pursuant to this Order.

10 3.9. Sampling, Data, and Document Availability. Respondent
11 shall permit the Department and its authorized representatives to
12 inspect and copy all sampling, testing, monitoring, and other
13 data generated by Respondent or on Respondent's behalf in any way
14 pertaining to work undertaken pursuant to this Order. Respondent
15 shall allow the Department and its authorized representatives to
16 take duplicates of any samples collected by Respondent pursuant
17 to this Order. Respondent shall maintain a central depository of
18 the data, reports, and other documents prepared pursuant to this
19 Order. All such data, reports, and other documents shall be
20 preserved by Respondent for a minimum of six years after the
21 conclusion of all activities under this Order. If the Department
22 requests that some or all of these documents be preserved for a
23 longer period of time, Respondent shall either comply with that
24 request, deliver the documents to the Department, or permit the
25 Department to copy the documents prior to destruction.
26 Respondent shall notify the Department in writing at least six
27 /////

1 months prior to destroying any documents prepared pursuant to
2 this Order.

3 3.10. Government Liabilities: The State of California
4 shall not be liable for injuries or damages to persons or
5 property resulting from acts or omissions by Respondent or
6 related parties specified in paragraph 3.16 in carrying out
7 activities pursuant to this Order, nor shall the State of
8 California be held as a party to any contract entered into by
9 Respondent or its agents in carrying out activities pursuant to
10 the Order.

11 3.11. Additional Enforcement Actions: By issuance of this
12 Order, the Department does not waive the right to take further
13 enforcement actions.

14 3.12. Incorporation of Plans and Reports. All plans,
15 schedules, and reports that require Department approval and are
16 submitted by Respondent pursuant to this Order are incorporated
17 in this Order upon approval by the Department.

18 3.13. Extension Request: If Respondent is unable to
19 perform any activity or submit any document within the time
20 required under this Order, the Respondent may, prior to
21 expiration of the time, request an extension of time in writing.
22 The extension request shall include a justification for the
23 delay.

24 3.14. Extension Approvals: If the Department determines
25 that good cause exists for an extension, it will grant the
26 request and specify in writing a new compliance schedule.

27 /////

3.15. Penalties for Noncompliance: Failure to comply with the terms of this Order may also subject Respondent to costs, penalties, and/or punitive damages for any costs incurred by the Department or other government agencies as a result of such failure, as provided by HSC section 25188 and other applicable provisions of law.

3.16. Parties Bound: This Order shall apply to and be binding upon Respondent, and its officers, directors, agents, employees, contractors, consultants, receivers, trustees, successors, and assignees, including but not limited to individuals, partners, and subsidiary and parent corporations, and upon any successor agency of the State of California that may have responsibility for and jurisdiction over the subject matter of this Order.

3.17. Compliance with Waste Discharge Requirements:
Respondent shall comply with all applicable waste discharge requirements issued by the State Water Resources Control Board or a California regional water quality control board.

PENALTY

4. Based on the foregoing DETERMINATION OF VIOLATIONS, the Department sets the amount of Respondent's penalty at \$25,000. Respondent agrees to make payment of the penalty as follows:

1) the initial monthly installment payment of \$1,000 is due before January 10, 1993; 2) eighteen monthly installment payments of \$1,000 are due before the tenth (10) day of every month, up to and including July 10, 1994; a final installment payment of \$6,000 is due before August 10, 1994. Respondent's checks shall

1 be made payable to the Department of Toxic Substances Control,
2 and shall identify the Respondent, as shown in the heading of
3 this case. Respondent shall deliver the penalty payments to:

4 Department of Toxic Substances Control
5 Accounting Office
6 400 P Street, 4th Floor
7 P. O. Box 806
8 Sacramento, California 95812-0806

9 A photocopy of the check shall be sent to:

10 Chief, Surveillance & Enforcement Branch
11 Department of Toxic Substances Control
12 1405 N. San Fernando Blvd., Suite 300
13 Burbank, California 91504

14 RIGHT TO A HEARING

15 5. Respondent waives any right to a hearing in this matter.

16 EFFECTIVE DATE

17 6. Effective upon Execution: This Consent Agreement and
18 Order is final and effective on the date upon which it is fully
19 executed by the parties hereto.

20 TIME PERIODS

21 7. "Days" for purposes of this Order means calendar days.

22 AUTHORITY TO ENTER INTO CONSENT AGREEMENT AND ORDER

23 8. Each signatory to this Consent Agreement and Order
24 certifies that he or she is fully authorized by the party he or
25 she represents to enter into this Consent Agreement and Order, to
26 execute it on behalf of the party represented and legally to bind
27 that party.

Dated: 12.07.92

Marquardt Manufacturing, Inc.

By: Leonard A. Kristal

Leonard Kristal

CHIEF EXECUTIVE OFFICER

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Dated: 2-10-93

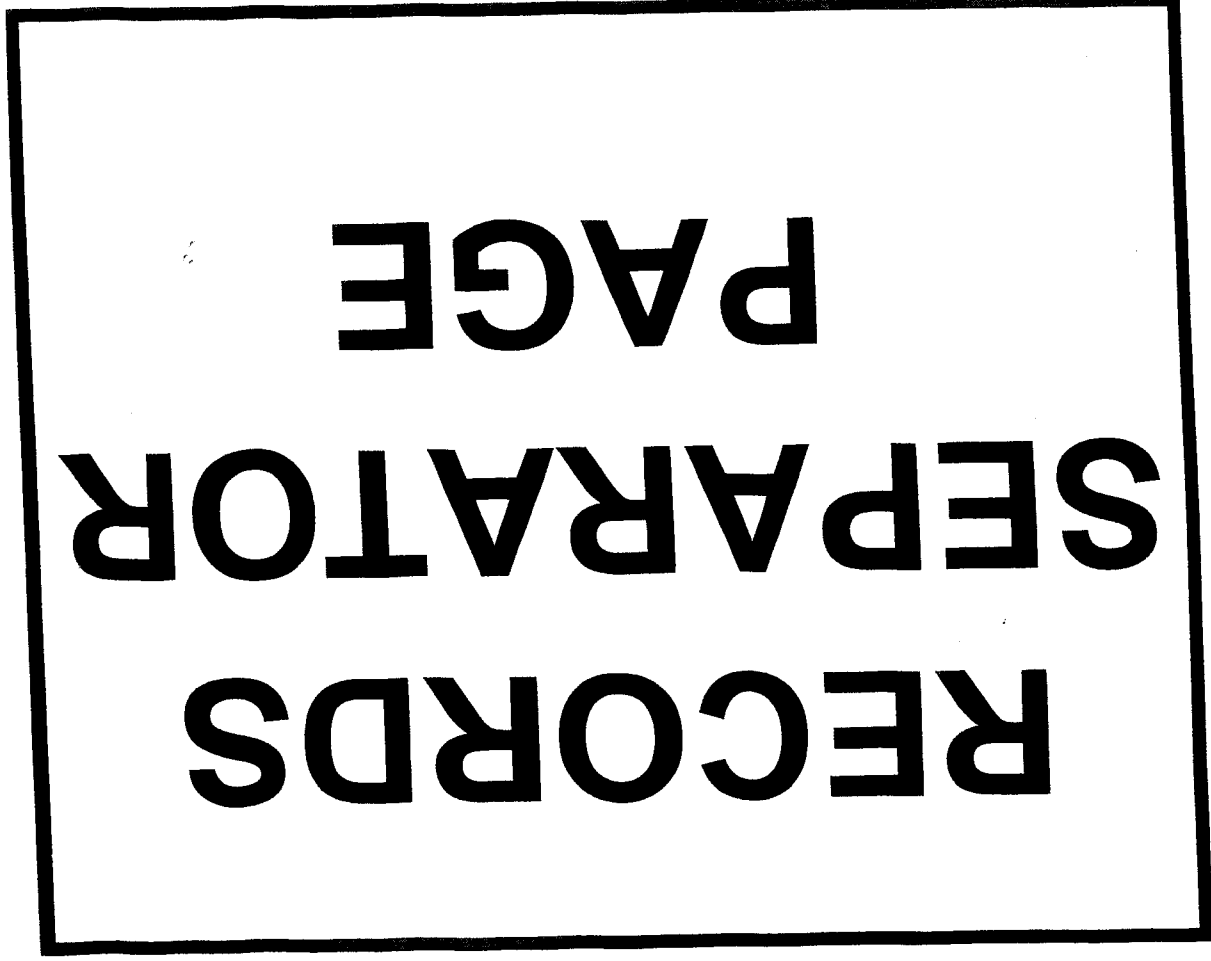
Department of Toxic Substances
Control

By: Florence Pearson
Florence Pearson, Branch
Chief, Region 3

1 bcc: Other Regional Administrators
2 Office of Local Enforcement
3 HQ's Surveillance and Enforcement Section
4 Local Health Officer
5 RWQCB (Region)
6 Local District or City Attorney
7 EPA, Region IX
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DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1405 N. SAN FERNANDO BLVD., SUITE 300
BURBANK, CA 91504
(818) 567-3000



November 30, 1992

Mr. Joseph Tamusaitis
The Marquardt Company
16555 Saticoy Street
Van Nuys, CA 91409

Dear Mr. Tamusaitis:

IN THE MATTER OF: The Marquardt Company, Docket No. HWCA 92/93-023

Enclosed please find an Enforcement Order and related documents concerning violations of Chapter 6.5 Division 20 of the California Health and Safety Code and Title 22 of the California Code of Regulations.

As indicated in the enclosures, you have a right to a hearing. Whether or not you choose to pursue an appeal, you are encouraged to explore the possibility of settlement by contacting James McCammon, at the address listed above, telephone number (818) 567-3006.

Sincerely,

A handwritten signature in cursive script that reads "Scott Simpson".

Scott Simpson
Branch Chief

1 .STATE OF CALIFORNIA
2 ENVIRONMENTAL PROTECTION AGENCY
3 DEPARTMENT OF TOXIC SUBSTANCES CONTROL

4 In the Matter of:) Docket HWCA 92/93-023
5)
6 The Marquardt Company) ENFORCEMENT ORDER
7 16555 Saticoy Street)
8 Van Nuys, California 91409) Health and Safety Code
9) Section 25187
10 Respondent.)
11)

12 INTRODUCTION

13 1.1. Parties. The State Department of Toxic Substances
14 Control (Department) issues this Enforcement Order (Order) to The
15 Marquardt Company (Respondent).

16 1.2. Site. Respondent generates, handles, treats, stores,
17 and/or disposes of hazardous waste at the following site: 16555
18 Saticoy Street, Van Nuys, California 91409 (Site). (Map
19 attached as Exhibit 1.)

20 1.3. Permit/Interim Status. The Department authorized
21 Respondent to manage hazardous waste by Interim Status Document
22 #CAD 044696102 issued on April 6, 1981.

23 1.4. Jurisdiction. Section 25187 of the Health and Safety
24 Code (HSC) authorizes the Department to order corrective action
25 and assess a penalty when the Department determines that any
26 person has violated specified provisions of the Health and Safety
27 Code or any permit, rule, regulation, standard, or requirement
28 issued or adopted pursuant thereto.

29 1.5. Exhibits. All exhibits attached to this Order are
30 incorporated herein by this reference.

31 / / /

1 1.6. Applicable Statutes and Regulations. Copies of the
2 statutes and regulations applicable to this Order are attached as
3 Exhibit (2).

4 DETERMINATION OF VIOLATIONS

5 2. The Department has determined:

6 2.1. The Respondent violated Health and Safety Code section
7 25189.2, subdivision (b) in that on or about May 27, 1992,
8 Respondent failed to notify the Department of the proposed change
9 in ownership of the facility, and of the proposed closure of the
10 facility thirty (30) days prior to such event. The requirement
11 is set forth in Respondent's Interim Status Document (ISD) as
12 General Condition I(1)(d).

13 2.2. The Respondent violated Health and Safety Code section
14 25189.2, subdivision (b) in that on or about May 27, 1992,
15 Respondent failed to allow the Department to inspect the
16 facility, including the storage area, take samples of waste, and
17 inspect pertinent records. The requirement is set forth in
18 Respondent's ISD as General Condition I(1)(b).

19 2.3. The Respondent violated title 22, California Code of
20 Regulations (Cal. Code Regs.), section 66265.173, subdivision (a)
21 in that on or about June 10, 1992, Respondent failed to maintain
22 seven (7) containers closed at all times, except when adding or
23 removing waste.

24 2.4. The Respondent violated title 22, Cal. Code Regs.,
25 section 66262.34, subdivision (f)(1) in that on or about June 10,
26 1992, Respondent failed to clearly mark and make visible for

27 / / / /

1 inspection on nine (9) containers the date upon which each period
2 of accumulation begins.

3 2.5. The Respondent violated title 22, Cal. Code Regs.,
4 section 66262.34, subdivision (f)(3) in that on or about June 10,
5 1992, Respondent failed to label twenty-three (23) containers
6 with the following:

7 (A) the composition and physical state of the wastes; and

8 (B) a statement or statements which called attention to the
9 particular hazardous waste properties of the waste; and

10 (C) name and address of the person producing the waste.

11 2.6. The Respondent violated title 22, Cal. Code Regs.,
12 section 66262.23 in that on or about June 10, 1992, Respondent
13 failed to complete the generator and/or waste section of the
14 following manifests according to the instruction set forth in the
15 Appendix of Chapter 12 [Standards Applicable to Generators of
16 Hazardous Waste]: #92163851; #92163869; #92163870; #88454978;
17 #88454977; #88454976; #90632902.

18 2.7. The Respondent violated title 22, Cal. Code Regs.,
19 section 66262.42, subdivision (b)(1)(2) in that on or about
20 June 10, 1992, Respondent failed to submit to the Department an
21 Exception Report when Respondent did not receive copies of the
22 following manifest with handwritten signatures of the owner or
23 operator of the designated facility within 45 days of the date
24 the waste was accepted by the initial transporter: #88454979.

25 2.8. The Respondent violated title 22, Cal. Code Regs.,
26 section 66268.7, subdivision (a)(6) in that on or about
27 June 10, 1992, Respondent failed to maintain onsite and available

1 for inspection all notices, certifications, demonstrations, waste
2 analysis data and other documentation produced pursuant to title
3 22, Cal. Code Regs., section 66268.7. Specifically, the
4 following manifests did not have the required Land Disposal
5 Restriction (LDR) notifications attached: #90632902; #92163869;
6 #92163870; #92163851; #88454979; #88454976; #88454969; #88454952;
7 #1880697; #1750600; #90017060.

8 2.9. The Respondent violated title 22, Cal. Code Regs.,
9 section 66265.16, subdivision (d)(1) & (2) in that on or about
10 June 10, 1992, Respondent failed to maintain onsite the following
11 information related to hazardous waste management:

12 (A) Job title for each position and name of the employee
13 filling each position;

14 (B) Written job descriptions of each position.

15 2.10. The Respondent violated title 22, Cal. Code Regs.,
16 section 66265.52, subdivision (d) in that on or about June 10,
17 1992, Respondent failed to name in its contingency plan which
18 person listed as the emergency coordinator is the primary
19 emergency coordinator and which is the alternate emergency
20 coordinator.

21 2.11. The Respondent violated title 22, Cal. Code Regs.,
22 section 66265.52, subdivision (g) in that on or about June 10,
23 1992, Respondent failed to include in its contingency plan the
24 current telephone number for the State Office of Emergency
25 Services.

26 2.12. The Respondent violated title 22, Cal. Code Regs.,
27 section 66265.52, subdivision (e) in that on or about June 10,

1 1992, Respondent failed to include in its contingency plan a list
2 of all emergency equipment, its location, and a physical
3 description of each item on the list, and a brief outline of its
4 capabilities.

5 2.13. The Respondent violated title 22, Cal. Code Regs.,
6 section 66265.31 in that on or about June 10, 1992, Respondent
7 failed to maintain and operate the facility to minimize the
8 possibility of a fire, explosion, or any unplanned sudden or non-
9 sudden release of hazardous waste or hazardous waste constituents
10 to air, soil, or surface water which could threaten human health
11 or the environment.

12 2.14. The Respondent violated title 22, Cal. Code Regs.,
13 section 66265.74, subdivision (a) in that on or about May 27,
14 1992, Respondent failed to furnish records upon request, and make
15 them available at all reasonable times for inspection.

16 2.15. The Respondent violated Health and Safety Code
17 section 25189.2, subdivision (a) in that on or about May 27,
18 1992, Respondent made false statements or representations on
19 approximately thirty-five (35) labels, manifests, records,
20 reports, and/or other documents filed, maintained, or used for
21 the purposes of compliance with the Hazardous Waste Control Law
22 (Health & Saf. Code, § 25100 et seq.).

23 SCHEDULE FOR COMPLIANCE

24 3. Based on the foregoing DETERMINATION OF VIOLATIONS, IT
25 IS HEREBY ORDERED THAT:

26 / / / /

27 / / / /

1 3.1.1. Immediately upon receipt of this Order, Respondent
2 shall maintain containers of hazardous waste closed at all times,
3 except when adding or removing waste.

4 3.1.2. Immediately upon receipt of this Order, Respondent
5 shall label all hazardous waste containers in accordance with
6 title 22, Cal. Code Regs., section 66262.34, subdivision (f).

7 3.1.3. Within thirty (30) days from the effective date of
8 this Order, Respondent shall submit to the Department copies of
9 Exception Reports for all manifests, including: #88454979.

10 3.1.4. Immediately upon receipt of this Order, Respondent
11 shall maintain at its facility all LDR notifications, and other
12 documentation required by title 22, Cal. Code Regs., section
13 66268.7, subdivision (a)(6). Within thirty (30) days from the
14 effective date of this Order, Respondent shall submit to the
15 Department copies of LDR notifications for the waste listed on
16 the following manifests: #90632902; #92163869; #92163870;
17 #92163851; #88454979; #88454976; #88454969; #88454952; #1880697;
18 #1750600; #90017060.

19 3.1.5. Within thirty (30) days from the effective date of
20 this Order, Respondent shall maintain at its facility and submit
21 to the Department the following information related to hazardous
22 waste management:

23 (A) Job title for each position and name of the employee
24 filling each position;

25 (B) Written job descriptions of each position.

26 3.1.6. Within thirty (30) days from the effective date of
27 this Order, Respondent shall list in its contingency plan which

1 person is the primary emergency coordinator and which is the
2 alternate emergency coordinator.

3 3.1.7. Within thirty (30) days from the effective date of
4 this Order, Respondent shall include in its contingency plan the
5 telephone number of the State Office of Emergency Services.

6 3.1.8. Within thirty (30) days from the effective date of
7 this Order, Respondent shall include in its contingency plan a
8 list of all emergency equipment, its location, and physical
9 description of each item on the list and a brief outline of its
10 capabilities.

11 3.1.9. Within thirty (30) days from the effective date of
12 this Order, Respondent shall submit to the Department a copy of
13 its contingency plan containing the corrections required in
14 Paragraphs 3.1.6-3.1.8.

15 3.1.10. Immediately upon receipt of this Order, Respondent
16 shall clean up spilled hazardous waste, hold all hazardous waste
17 in non-leaking closed containers and take whatever action is
18 necessary to prevent spillage and leaking of hazardous waste to
19 the environment.

20 3.1.11. Immediately upon receipt of this Order, Respondent
21 shall maintain onsite all records required by title 22, Cal. Code
22 Regs., sections 66265.74 and 66265.16, subdivision (d).

23 3.2. Submittals. All submittals from a Respondent pursuant
24 to this Order shall be sent simultaneously to:

25 Florence Pearson
26 Branch Chief
27 Department of Toxic Substances Control
 1405 N. San Fernando, Blvd., Suite 300
 Burbank, California 91504

1 Robert P. Ghirelli
2 Executive Officer
3 Regional Water Quality Control Board
4 Los Angeles Region
5 101 Centre Plaza Drive
6 Monterey Park, California 91754-2156

7 Anastacio Medina, Chief
8 Hazardous Waste Control Program
9 2615 South Grand Avenue, 6th Floor
10 Los Angeles, California 90007

11 3.3. Communications. All approvals and decisions of the
12 Department made regarding submittals and notifications will be
13 communicated to Respondent in writing by the Regional
14 Administrator, Department of Toxic Substances Control, or his/her
15 designee. No informal advice, guidance, suggestions, or comments
16 by the Department regarding reports, plans, specifications,
17 schedules, or any other writings by Respondent shall be construed
18 to relieve Respondent of the obligation to obtain such formal
19 approvals as may be required.

20 3.4. Department Review and Approval. If the Department
21 determines that any report, plan, schedule, or other document
22 submitted for approval pursuant to this Order fails to comply
23 with the Order or fails to protect public health or safety or the
24 environment, the Department may:

25 a. Modify the document as deemed necessary and approve
26 the document as modified or

27 b. Return the document to Respondent with recommended
28 changes and a date by which Respondent must submit to the
29 Department a revised document incorporating the recommended
30 changes.

31 / / / /

1 3.5. Compliance with Applicable Laws: Respondent shall
2 carry out this Order in compliance with all local, State, and
3 federal requirements, including but not limited to requirements
4 to obtain permits and to assure worker safety.

5 3.6. Endangerment during Implementation: In the event that
6 the Department determines that any circumstances or activity
7 (whether or not pursued in compliance with this Order) are
8 creating an imminent or substantial endangerment to the health or
9 welfare of people on the site or in the surrounding area or to
10 the environment, the Department may order Respondent to stop
11 further implementation of this Order for such period of time as
12 needed to abate the endangerment. Any deadline in this Order
13 directly affected by a Stop Work Order under this section shall
14 be extended for the term of the Stop Work Order.

15 3.7. Liability: Nothing in this Order shall constitute or
16 be construed as a satisfaction or release from liability for any
17 conditions or claims arising as a result of past, current, or
18 future operations of Respondent. Notwithstanding compliance with
19 the terms of this Order, Respondent may be required to take
20 further actions as are necessary to protect public health or
21 welfare or the environment.

22 3.8. Site Access: Access to the site shall be provided at
23 all reasonable times to employees, contractors, and consultants
24 of the Department, and any agency having jurisdiction. Nothing
25 in this Order is intended to limit in any way the right of entry
26 or inspection that any agency may otherwise have by operation of
27 any law. The Department and its authorized representatives shall

1 have the authority to enter and move freely about all property at
2 the Site at all reasonable times for purposes including but not
3 limited to: inspecting records, operating logs, and contracts
4 relating to the Site; reviewing the progress of Respondent in
5 carrying out the terms of this Order; and conducting such tests
6 as the Department may deem necessary. Respondent shall permit
7 such persons to inspect and copy all records, documents, and
8 other writings, including all sampling and monitoring data, in
9 any way pertaining to work undertaken pursuant to this Order.

10 3.9. Sampling, Data, and Document Availability. Respondent
11 shall permit the Department and its authorized representatives to
12 inspect and copy all sampling, testing, monitoring, and other
13 data generated by Respondent or on Respondent's behalf in any way
14 pertaining to work undertaken pursuant to this Order. Respondent
15 shall allow the Department and its authorized representatives to
16 take duplicates of any samples collected by Respondent pursuant
17 to this Order. Respondent shall maintain a central depository of
18 the data, reports, and other documents prepared pursuant to this
19 Order. All such data, reports, and other documents shall be
20 preserved by Respondent for a minimum of six years after the
21 conclusion of all activities under this Order. If the Department
22 requests that some or all of these documents be preserved for a
23 longer period of time, Respondent shall either comply with that
24 request, deliver the documents to the Department, or permit the
25 Department to copy the documents prior to destruction.

26 Respondent shall notify the Department in writing at least six
27 / / / /

1 months prior to destroying any documents prepared pursuant to
2 this Order.

3 3.10. Government Liabilities: The State of California
4 shall not be liable for injuries or damages to persons or
5 property resulting from acts or omissions by Respondent or
6 related parties specified in paragraph 3.16 in carrying out
7 activities pursuant to this Order, nor shall the State of
8 California be held as a party to any contract entered into by
9 Respondent or its agents in carrying out activities pursuant to
10 the Order.

11 3.11. Additional Enforcement Actions: By issuance of this
12 Order, the Department does not waive the right to take further
13 enforcement actions.

14 3.12. Incorporation of Plans and Reports. All plans,
15 schedules, and reports that require Department approval and are
16 submitted by Respondent pursuant to this Order are incorporated
17 in this Order upon approval by the Department.

18 3.13. Extension Request: If Respondent is unable to
19 perform any activity or submit any document within the time
20 required under this Order, the Respondent may, prior to
21 expiration of the time, request an extension of time in writing.
22 The extension request shall include a justification for the
23 delay.

24 3.14. Extension Approvals: If the Department determines
25 that good cause exists for an extension, it will grant the
26 request and specify in writing a new compliance schedule.

27 / / / /

1 Department of Toxic Substances Control
2 Accounting Office
3 400 P Street, 4th Floor
4 P. O. Box 806
5 Sacramento, California 95812-0806

6 A photocopy of the check shall be sent to:

7 Chief, Surveillance & Enforcement Branch
8 Department of Toxic Substances Control
9 1405 N. San Fernando Blvd., Suite 300
10 Burbank, California 91504

11 RIGHT TO A HEARING

12 5. You may request a hearing to challenge the Order. Appeal
13 procedures are described in the attached Statement to Respondent.

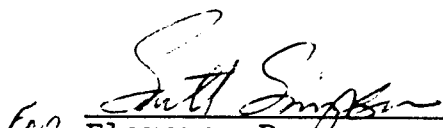
14 EFFECTIVE DATE

15 6.1. This Order is final and effective fifteen days from
16 the date it is served on you, unless you request a hearing within
17 the fifteen-day period.

18 TIME PERIODS

19 7. "Days" for purposes of this Order means calendar days.

20 Date of Issuance Nov. 25, 1992.

21 *for* 
22 Florence Pearson
23 Branch Chief
24 Department of Toxic Substances Control
25
26
27

STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

In the Matter of:) Docket HWCA 92/93-023
The Marquardt Company) STATEMENT TO RESPONDENT
16555 Saticoy Street)
Van Nuys, California 91409) Enforcement Order
Respondent.)

TO THE ABOVE RESPONDENT:

An Enforcement Order (Order) is attached to this statement and is hereby served upon you. The Order has been filed by the Department of Toxic Substances Control (Department).

Unless a written request for a hearing signed by you or on your behalf is delivered or mailed to the Department within fifteen days after you received a copy of the Order, you will be deemed to have waived your right to a hearing in this matter. If you do not file a timely hearing request, the Enforcement Order becomes final automatically.

The request for a hearing may be made by delivering or mailing one copy of the enclosed form entitled "Notice of Defense" or by delivering or mailing a Notice of Defense as provided in section 11506 of the Government Code to:

Chief Counsel
Toxics Legal Office
Department of Toxic Substances Control
400 P Street
P. O. Box 806
Sacramento, CA 95812-0806

1 The enclosed Notice of Defense, if signed and filed with
2 the Department, is deemed a specific denial of all parts of the
3 Order, but you will not be permitted to raise any objection to the
4 form of the Order unless you file a further Notice of Defense as
5 provided in section 11506 of the Government Code within fifteen
6 days after service of the Order upon you.

7 If you file a Notice of Defense within the time
8 permitted, a hearing on the allegations made in the Order will be
9 conducted by the Office of Administrative Hearings of the
10 Department of General Services in accordance with the procedures
11 specified in Health and Safety Code section 25187 and Government
12 Code sections 11507 et seq.

13 The hearing may be postponed for good cause. If you have
14 good cause, you must notify the Department within ten working days
15 after you discover the good cause. Failure to notify the
16 Department within ten days will deprive you of a postponement.

17 Copies of sections 11507.5, 11507.6, and 11507.7 of the
18 Government Code are attached. If you desire the names and
19 addresses of witnesses or an opportunity to inspect and copy items
20 in possession, custody, or control of the Department,
21 you may contact:

22 Chief Counsel
23 Toxics Legal Office
24 Department of Toxic Substances Control
25 400 P Street
 P. O. Box 806
 Sacramento, CA 95812-0806

26 Whether or not you have a hearing, you may confer
27 informally with the Department to discuss the alleged facts,

1 determinations, corrective actions and penalty. An informal
2 conference does not, however, postpone the fifteen-day period you
3 have to request a hearing on the Order. An informal conference may
4 be pursued simultaneously with the hearing process.

5 You may but are not required to be represented by counsel
6 at any or all stages of these proceedings.

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STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

In the Matter of:) Docket No. 92/93-023
The Marquardt Company)
16555 Saticoy Street) NOTICE OF DEFENSE
Van Nuys, California 91409)
Respondent.)
Health and Safety Code
Section 25187(d)

I, the undersigned Respondent, acknowledge receipt of a
copy of the Enforcement Order, Statement to Respondent,
Government Code sections 11507.5, 11507.6, and 11507.7, and two
copies of a Notice of Defense.

I request a hearing to permit me to present my defense
to the allegations contained in the Enforcement Order.

Dated: _____

(Signature of Respondent)

Please Type or Print the Name and Mailing
Address of Respondent

(Name)

(Street Address)

(City) (State) (Zip)

(Telephone Number)

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1405 N. SAN FERNANDO BLVD., SUITE 300
BURBANK, CA 91504
(818) 567-3000



September 28, 1992

CERTIFIED MAIL

Mr. Emmons Brown
Director Ordnance Operations
The Marquardt Company
16555 Saticoy Street
Van Nuys, California 91409

Dear Mr. Brown:

AMENDED REPORT OF VIOLATION

On May 27, 1992, and June 10, 1992, the Department of Toxic Substances Control (the Department) conducted inspections of The Marquardt Company (TMC), located at 16555 Saticoy Street in Van Nuys, California 91409. As a result of those inspections, violations of the hazardous waste statutes and regulations were identified. On August 12, 1992, the Department issued TMC a Report of Violation listing 18 violations.

Based on the Department's review of information derived from these inspections, the Department is issuing these amendments to the Report of Violation.

I. VIOLATIONS:

Counts 1 and 12 are rescinded and are combined into the following count:

Count 19: Health and Safety Code, Section 25189(b), TMC violated Section 25189(b) in that on or about May 27, 1992, TMC intentionally failed to notify the Department of the proposed change in ownership of the facility, and of the proposed closure of the facility thirty (30) days prior to such event. The requirement is set forth in TMC's Interim Status Document (ISD) as General Condition I(1)(d).

Counts 15 and 16 are rescinded and are combined into the following count:

Count 20: Health and Safety Code, Section 25189(b), TMC violated Section 25189(b) in that on or about May 27, 1992, TMC intentionally or negligently failed to allow the Department to inspect the facility, including the storage area, take samples of wastes, and inspect pertinent records. The requirement is set forth in TMC's Interim Status Document (ISD) as

Mr. Emmons Brown

September 28, 1992

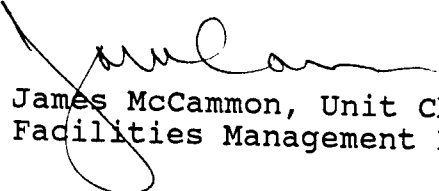
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General Condition I(1)(b).

The issuance of this Report of Violations does not preclude the Department from taking administrative, civil or criminal action as a result of the violations noted herein.

If you have any questions regarding this Report, please contact Martina Gutierrez at (818) 567-3033.

Sincerely,



James McCammon, Unit Chief
Facilities Management Branch

Certified Mail

P 565 319 477

(Return Receipt Requested)

cc: Mr. James R. Cutright
Acting Chief Counsel
Office of Legal Counsel
Department of Toxic Substances Control
P. O. Box 806
Sacramento, California 95812-0806

Ms. Mary Locke, Chief
Office of Local Enforcement
Department of Toxic Substances Control
P. O. Box 806
Sacramento, California 95812-0806

Mr. Larry Matz
Acting Chief
HQ's Surveillance and Enforcement Branch
Department of Toxic Substances Control
P. O. Box 806
Sacramento, California 95812-0806

Ms. Maria Kelly ✓
Waste Compliance Branch (H-4-1)
U. S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Mr. Emmons Brown

September 28, 1992

Page 3

cc: Mr. Anastacio Medina, Chief
Hazardous Waste Control Program
Los Angeles County Fire Department
2615 South Grand Avenue, 6th Floor
Los Angeles, California 90007

Mr. Robert P. Ghirelli
Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Ms. Theodora Berger
Assistant Attorney General
Environmental Law Section
Department of Justice
300 South Spring Street
North Tower, 11th Floor
Los Angeles, California 90013

RECORDS SEPARATOR PAGE

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SEPARATOR
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DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1405 N. SAN FERNANDO BLVD., SUITE 300
BURBANK, CA 91504
(818) 567-3000



August 12, 1992

CERTIFIED MAIL

Mr. Emmons Brown
Director Ordnance Operations
The Marquardt Company
16555 Saticoy Street
Van Nuys, CA 91409

Dear Mr. Brown:

REPORT OF VIOLATION AND SCHEDULE FOR COMPLIANCE

On May 27, 1992, and June 10, 1992, the Department of Toxic Substances Control conducted inspections of The Marquardt Company (TMC), located at 16555 Saticoy Street in Van Nuys, California 91409.

As a result of those inspections, violations of the hazardous waste statutes and regulations were identified.

The specific violations and required corrective action are listed below. Failure to correct the identified violations within the schedule provided will result in the Department citing you for continuing/additional violations.

I. VIOLATIONS:

- COUNT 1: California Code of Regulations (Cal. Code Regs.), Section 66265.112(d)(1) On or about May 27, 1992, and June 10, 1992, the facility failed to submit the closure plan to the Department at least 180 days prior to the date owner or operator expected to begin final closure of a facility.
- COUNT 2: Cal. Code Regs., Section 66265.173(a) on or about June 10, 1992, TMC violated Section 66265.173(a) in that the facility failed to maintain containers closed at all times, except when adding or removing waste.
- COUNT 3: Cal. Code Regs., Section 66262.34(f)(1), TMC violated Section 66262.34(f)(1) in that on or about June 10, 1992, the facility failed to clearly mark and make visible for inspection on each container the date upon which each period of accumulation begins.

Mr. Emmons Brown

August 12, 1992

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COUNT 4: Cal. Code Regs., Section 66262.34(f)(3), TMC violated Section 66262.34(f)(3) in that on or about June 10, 1992, the facility failed to label containers with the following:

- (A) the composition and physical state of the wastes; and
- (B) a statement or statements which called attention to the particular hazardous waste properties of the waste and
- (C) name and address of the person producing the waste.

COUNT 5: Cal. Code Regs., Section 66262.23, TMC violated Section 66262.23 in that on or about June 10, 1992, the facility failed to complete the generator and waste section of the manifest according to instruction set forth in the Appendix of this Chapter 12, Division 4.5, Title 22 Cal. Code Regs.

COUNT 6: Cal. Code Regs., 66262.42(b)(1)(2), TMC violated Section 66262.42(b)(1)(2), in that on or about June 10, 1992, the facility failed to submit an Exception Report to the Department when TMC did not receive copies of manifests with handwritten signatures of the owner or operator of the facility to which the hazardous wastes were sent within 45 days of the date the waste was accepted by the initial transporter.

COUNT 7: Cal. Code Regs., Section 66268.7(a)(6), TMC violated Section 66268.7(a)(6), in that on or about June 10, 1992, all notices, certifications, demonstrations waste analysis data and other documentation produced pursuant to this section were not retained on site and were not available for inspection.

COUNT 8: Cal. Code Regs., Section 66265.16(d)(1)(2) TMC violated Section 66265.16(d)(1)(2) in that on or about June 10, 1992, the facility failed to maintain the following information related to hazardous waste management:

- 1) Job title for each position,
- 2) Name of the employee filling each job,
- 3) Written job descriptions for each position.

COUNT 9: Cal. Code Regs., Section 66265.52(d) violated section 66265.52(d) in that on or about June 10, 1992, the facility failed to name which person listed as emergency coordinator was primary emergency coordinator and which was the alternate emergency coordinator.

Mr. Emmons Brown

August 12, 1992

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- COUNT 10: Cal Code Regs., Section 66265.52(g) TMC violated Section 66265.52(g) in that on or about June 10, 1992, the facility failed to include in the Emergency Business Plan the current telephone number for the State Office of Emergency Services.
- COUNT 11: Cal Code Regs., Section 66265.52(e) TMC violated Section 66265.52(e) in that on or about June 10, 1992, the facility failed to include a list of all emergency equipment, its location, and a physical description of each item on the list, and a brief outline of its capabilities.
- COUNT 12: Cal. Code Regs., Section 66270.72(a)(4), TMC violated Section 66270.72(a)(4) in that on or about May 27, 1992, the facility failed to submit to the Department a change of ownership notification.
- COUNT 13: Cal. Code Regs., Section 66265.31, TMC violated Section 66265.31 in that on or about June 10, 1992, the facility failed to maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.
- COUNT 14: Cal. Code Regs., Section 66265.74(a), TMC violated Section 66265.74(a) in that on or about May 27, 1992, the facility failed to furnish records upon request, and make them available at all reasonable times for inspection.
- COUNT 15: Health and Safety Code, Section 25191(a)(3) TMC violated section 25191(a)(3) in that on or about May 27, 1992, Mr. Emmons Brown, acting on behalf of the facility, concealed information relating to the generation, storage, or handling of hazardous waste required to be maintained pursuant to this chapter.
- COUNT 16: Health and Safety Code, Section 25195(a), TMC violated Section 25195(a) in that on or about May 27, 1992, Mr. Emmons Brown, acting on behalf of the facility, willfully prevented, interfered with, or attempted to impede in the work of a duly authorized representative of the department in the lawful enforcement of provisions of this chapter.

Mr. Emmons Brown
August 12, 1992
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COUNT 17: Health and Safety Code, Section 25189(c), TMC violated section 25189(c) in that on or about June 9, 1992, the facility abandoned hazardous waste in the property that was leased to Marquardt Manufacturing Inc.

COUNT 18: Health and Safety Code, Section 25191(a)(1), TMC violated Section 25191(a)(1), in that on or about May 27, 1992, Mr. Emmons Brown, acting on behalf of the facility made false statements or representations in labels, or drums of hazardous waste.

II. SCHEDULE FOR COMPLIANCE:

1. Correct violations upon receipt of this Report.

Please submit a written certification to this office within 30 days of receipt of this Report, which contains the language in Title 22, Cal. Code Regs., section 66270.11 (d), that the violations have been corrected.

The Department may conduct a re-inspection of TMC to verify compliance.

The issuance of this Report of Violations and Schedule for Compliance does not preclude the Department from taking administrative, civil or criminal action as a result of the violations noted herein.

If you have any questions regarding this Report, please contact Martina Gutierrez at (818) 567-3033.

Sincerely,


.. James McCammon
Senior Hazardous Materials Specialist

Enclosures

Certified Mail
P 565 319 381
(Return Receipt Requested)

cc: Mr. James R. Cutright
Acting Chief Counsel
Toxics Legal Office
Department of Toxic Substances Control
P. O. Box 806
Sacramento, California 95812-0806

Mr. Emmons Brown

August 12, 1992

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cc: Ms. Mary Locke, Chief
Office of Local Enforcement
Department of Toxic Substances Control
P. O. Box 806
Sacramento, California 95812-0806

Mr. Larry Matz
Acting Chief
HQ's Surveillance and Enforcement Branch
Department of Toxic Substances Control
P. O. Box 806
Sacramento, California 95812-0806

Ms. Maria Kelly
Waste Compliance Branch (H-4-1)
U. S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Mr. Anastacio Medina, Chief
Hazardous Waste Control Program
Los Angeles County Fire Department
2615 South Grand Avenue, 6th Floor
Los Angeles, California 90007

Mr. Robert P. Ghirelli
Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Ms. Theodora Berger
Assistant Attorney General
Environmental Law Section
Department of Justice
300 South Spring Street
North Tower, 11th Floor
Los Angeles, California 90013

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DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1405 N. SAN FERNANDO BLVD., SUITE 300
BURBANK, CA 91504
(818) 567-3000



August 12, 1992

CERTIFIED MAIL

Mr. Kenneth R. Walker, Manager
Security Services
Kaiser Marquardt
16555 Saticoy Street
Van Nuys, California 91406-1739

Dear Mr. Walker:

REPORT OF VIOLATIONS AND SCHEDULE FOR COMPLIANCE

On June 3, 1992, the Department of Toxic Substances Control, conducted an inspection of Kaiser Marquardt (KM) located at 16555 Saticoy Street in Van Nuys, California 91406-1739.

As a result of that inspection, violations of the hazardous waste statutes and regulations were identified.

The specific violations and required corrective action are listed below. Failure to correct the identified violations within the schedule provided will result in the Department citing your for continuing/additional violations.

I. VIOLATIONS:

COUNT 1: California Code of Regulations (Cal. Code Regs.), Section 66265.16(d)(1)(2) KM violated Section 66265.16(d)(1)(2) in that on or about June 3, 1992, the facility failed to maintain the following information related to hazardous waste management:

- 1) Job titles for each position,
- 2) Name of the employees filling each job.
- 3) Written job descriptions for each position.

COUNT 2: Cal. Code Regs., Section 66265.16(a)(3) KM violated Section 66265.16(a)(3) in that on or about June 3, 1992, the facility failed to design a training program to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems.

COUNT 3: Cal. Code Regs., Section 66265.52(d) violated Section 66265.52(d) in that on or about June 3, 1992, the facility failed to name the primary emergency coordinator and an alternate emergency coordinator.

Mr. Kenneth R. Walker

August 12, 1992

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- COUNT 4: Cal. Code Regs., Section 66265.52(g) KM violated Section 66265.52(g) in that on or about June 3, 1992, the facility failed to include in the Emergency Business Plan the current telephone number for the State Office of Emergency Services.
- COUNT 5: Cal. Code Regs., Section 66265.53(b) KM violated Section 66265.53(b) in that the facility failed to submit copies of the Contingency Plan to the State Office of Emergency Services and local Police Departments.
- COUNT 6: Cal. Code Regs., Section 66265.52(f) KM violated Section 66265.52(f) in that on or about June 3, 1992, the facility failed to include in the contingency plan an evacuation plan for facility personnel.
- COUNT 7: Cal. Code Regs., Section 66265.52(e) KM violated Section 66265.52(e) in that on or about June 3, 1992, the facility failed to include a list of all emergency equipment at the facility, the location, and a physical description of each item on the list, and its capabilities.
- COUNT 8: Cal. Code Regs., Section 66262.12(a) KM violated Section 66262.12(a) in that on or about June 3, 1992, the facility stored hazardous waste without having received an EPA Identification Number.
- COUNT 9: Cal. Code Regs., Section 66265.32(b) KM violated Section 66265.32(b) in that on or about June 3, 1992, the facility did not have a device such as a telephone or a hand-held two-way radio where hazardous waste was stored or treated.
- COUNT 10: Cal. Code Regs., Section 66265.32(c), KM violated Section 66265.32(c) in that on or about June 3, 1992, the facility was not equipped with decontamination equipment in the hazardous waste storage area.
- COUNT 11: Health and Safety Code, Section 25201(a) KM violated Section 25201(a) in that on or about June 3, 1992, the facility treated hazardous waste without a permit or other grant of authorization from the department.

II. SCHEDULE FOR COMPLIANCE:

1. Correct violations upon receipt of this Report.

Mr. Kenneth R. Walker

August 12, 1992

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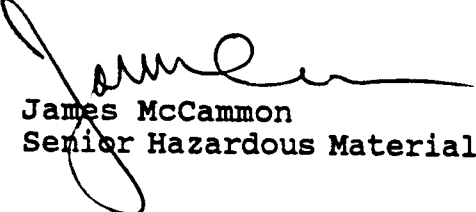
Please submit a written certification to this office within 30 days of receipt of this Report, which contains the language in Title 22, Cal. Code Regs., section 66270.11 (d), that the violations have been corrected.

The Department may conduct a re-inspection of KM to verify compliance.

The issuance of this Report of Violation and Schedule for Compliance does not preclude the Department from taking administrative, civil or criminal action as a result of the violations noted herein.

If you have any questions regarding this Report, please contact Martina Gutierrez at (818) 567-3033.

Sincerely,



James McCammon
Senior Hazardous Materials Specialist

Enclosures

Certified Mail

p 565 319 382

(Return Receipt Requested)

cc: Mr. James R. Cutright
Acting Chief Counsel
Toxics Legal Office
Department of Toxic Substances Control
P. O. Box 806
Sacramento, California, 95812-0806

Ms. Mary Locke, Chief
Office of Local Enforcement
Department of Toxic Substances Control
P. O. Box 806
Sacramento, California 95812-0806

Mr. Larry Matz
Acting Chief
HQ's Surveillance and Enforcement Branch
Department of Toxic Substances Control
P. O. Box 806
Sacramento, California 95812-0806

Mr. Kenneth R. Walker

August 12, 1992

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cc: Ms. Maria Kelly✓
Waste Compliance Branch (H-4-1)
U. S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Mr. Anastacio Medina, Chief
Hazardous Waste Control Program
Los Angeles County Fire Department
2615 South Grand Avenue, 6th Floor
Los Angeles, California 90007

Mr. Robert P. Ghirelli
Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Ms. Theodora Berger
Assistant Attorney General
Environmental Law Section
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Los Angeles, California 90013

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DEPARTMENT OF TOXIC SUBSTANCES CONTROL

(REGION 3)

1405 N. SAN FERNANDO BOULEVARD, SUITE 300

BURBANK, CA 91504

(818) 567-3000



November 5, 1991

CERTIFIED MAIL

CT Corporation Systems
818 W. 7th Street
Los Angeles, CA 90017

Agent for Service of Process for:

The Marquardt Company
16555 Saticoy Street
Van Nuys, CA 91409

Dear Sirs:

IN THE MATTER OF: DOCKET NUMBER HWCA 91/92-011

Enclosed please find First Amended Corrective Action Order and/or Complaint for Penalty and related documents concerning violations of Chapter 6.5 of the California Health and Safety Code and Title 22 of the California Code of Regulations.

As indicated in the enclosures, The Marquardt Company has a right to a hearing. Whether or not it chooses to pursue an appeal, it is encouraged to explore the possibility of settlement by contacting Razel Dizon at the above address, or telephone number (818) 567-3109.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dennis Dickerson", is written over a horizontal line.

Dennis Dickerson,
Regional Administrator

Enclosures

cc: Sharon Bradley, Environmental Analyst
The Marquardt Company
16555 Saticoy Street
Van Nuys, CA 91409

Certified Mail

84960

Return Receipt Requested

STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

In the Matter of:) Docket HWCA 91/92-011
)
The Marquardt Company)
16555 Saticoy Street) FIRST AMENDED CORRECTIVE ACTION ORDER
7 Van Nuys, CA 91409) AND COMPLAINT FOR PENALTY
)
) Health and Safety Code
Respondent) Sections 25187 and 25189.2
)

INTRODUCTION

1.1. Parties. The California Environmental Protection Agency, Department of Toxic Substances Control (Department) issues this First Amended Corrective Action Order and Complaint for Penalty (Order) to The Marquardt Company, (Respondent).

1.2. Site. Respondent generates, handles, treats, stores, and/or disposes of hazardous waste at the following site: 16555 Saticoy Street, Van Nuys, California 91409 (Site).

1.3. Permit/Interim Status. The Department authorized Respondent to manage hazardous waste by Interim Status Document # CAD044696102 (ISD) issued on April 6, 1981. (Exhibit 1)

1.4. Jurisdiction. Section 25187 of the Health and Safety Code (HSC) authorizes the Department to issue an Order when the Department determines that any person has violated, is violating, or threatens to violate specified provisions of the Health and Safety Code or any permit, rule, regulation, standard, or requirement issued or adopted pursuant thereto.

/////

1 HSC section 25189.2 authorizes the Department to issue a Complaint and to impose
2 a penalty on persons who commit specified acts, pursuant to the procedures set
3 forth in HSC section 25189.3.

4 1.5. Exhibits. All exhibits attached to this Order and Complaint are
5 incorporated herein by this reference.

6 DETERMINATION OF VIOLATIONS

7 2. The Department has determined that the Respondent has violated, is
8 violating, or threatens to violate HSC section 25189.2 and other specified
9 provisions as follows:

10 2.1. On or about January 31, 1991, Respondent violated title 22, Cal. Code
11 Regs., section 67120 (a) [presently title 22 , Cal. Code Regs., section
12 66265.31], in that the Respondent failed to maintain and operate the facility to
13 minimize the possibility of a release of hazardous waste to the soil in an area
14 north of the hazardous waste storage area.

15 2.2. On January 29, 1991, Respondent violated title 22, Cal. Code Regs.,
16 section 66508 (a) (2) [presently title 22, Cal. Code Regs., section 66262.34 (a)
17 (2)], by storing one container and one fifty-five-gallon drum identified by
18 Costano as containing hazardous waste with no accumulation start dates.

19 2.3. On January 29, 1991, Respondent violated title 22, Cal. Code Regs.,
20 section 67243 (a) [presently title 22, Cal. Code Regs., section 66265.173 (a)],
21 by storing one open fifty-five-gallon drum of hazardous waste in the area north
22 of Building 109. The drum contained filter cake with hazardous waste levels of
23 chromium.

24 2.4. On February 8, 1991, Respondent violated title 22, Cal. Code Regs.
25 Section 67141 (d) [presently title 22, Cal. Code Regs., section 66264.52 (d)],
26 by not identifying in a contingency plan the primary emergency coordinator
27 and/or other persons qualified to act as emergency coordinators, as well as the

/////

1 home addresses and phone numbers of all persons qualified to act as emergency
2 coordinators.

3 2.5. On February 8, 1991, Respondent violated title 22, Cal. Code Regs.,
4 section 66481(b) [presently title 22, Cal. Code Regs., section 66262], by having
5 twelve hazardous waste manifests that were not accurately and completely filled
6 out.

7 2.6. On February 8, 1991, Respondent violated title 22, Cal. Code Regs.
8 section 67105 (d) (3) [presently title 22, Cal. Code Regs., section 66264.16 (d)
9 (3)], by not having a written description of the type and amount of both
10 introductory and continuous training that will be given to each person filling a
11 position related to hazardous waste management.

12
13 SCHEDULE FOR COMPLIANCE

14 3. Based on the foregoing DETERMINATION OF VIOLATIONS, IT IS HEREBY
15 ORDERED THAT:

16 3.1.1. On the effective date of this Order, Respondent shall characterize
17 the extent of the contamination, and remediate all involved areas of
18 contaminated soil.

19 3.1.2. On the effective date of this Order, Respondent shall clearly fill
20 out all hazardous waste labels including accumulation start dates.

21 3.1.3. On the effective date of this Order, Respondent shall properly
22 store, secure, and maintain all hazardous waste drums including the two open
23 fifty-five gallon drums located to the north of Building 109.

24 3.1.4. On the effective date of this Order, Respondent shall list in a
25 contingency plan the home address for the primary emergency coordinator or other
26 persons qualified to act as emergency coordinators. Respondent shall also
27 specify in a contingency plan the emergency coordinator and/or alternates.

/////

1 3.1.5. On the effective date of this Order, Respondent shall accurately
2 fill out and complete all hazardous waste manifests.

3 3.1.6. On the effective date of this Order, Respondent shall provide to
4 the Department a written description of the type and amount of both introductory
5 and continuous training that will be given to each person filling a position
6 related to hazardous waste management.

7 3.2. Submittals. All submittals from Respondents pursuant to this Order
8 shall be sent simultaneously to:

9
10 Dennis Dickerson, Administrator
11 Region 3
12 CAL-EPA
13 Department of Toxic Substances Control
14 1405 N. San Fernando Boulevard, Suite 300
15 Burbank, CA 91504

16 Robert Ghirelli,
17 Executive Officer
18 Regional Water Quality Control Board
19 Los Angeles Region
20 101 Center Plaza Drive
21 Monterey Park, CA 91754-2156

22 Anastacio Medina, Chief
23 Hazardous Waste Control Program
24 Los Angeles County
25 Department of Health Services
26 2615 South Grand Avenue, 6th Floor
27 Los Angeles, CA 90007

21 3.3. Communications. All approvals and decisions of the Department made
22 regarding submittals and notifications will be communicated to Respondent in
23 writing by a Branch Chief, Department of Toxic Substances Control, Region 3, or
24 his/her designee. No informal advice, guidance, suggestions, or comments by the
25 Department regarding reports, plans, specifications, schedules, or any other
26 writings by Respondents shall be construed to relieve Respondent of the
27 obligation to obtain such formal approvals as may be required.

/////

1 3.4. Department Review and Approval. If the Department determines that
2 any report, plan, schedule, or other document submitted for approval pursuant to
3 this Order fails to comply with the Corrective Action Order or fails to protect
4 public health or safety or the environment, the Department may:

5 a. Modify the document as deemed necessary and approve the document
6 as modified or

7 b. Return the document to Respondents with recommended changes and a
8 date by which Respondent must submit to the Department a revised document
9 incorporating the recommended changes.

10 3.5. Compliance with Applicable Laws: Respondent shall carry out this
11 Order in compliance with all local, State, and federal requirements, including
12 but not limited to requirements to obtain permits and to assure worker safety.

13 3.6. Endangerment during Implementation: In the event that the Department
14 determines that any circumstances or activity (whether or not pursued in
15 compliance with this Order) are creating an imminent or substantial endangerment
16 to the health or welfare of people at the Site or in the surrounding area or to
17 the environment, the Department may order Respondents to stop further
18 implementation of this Order for such period of time as needed to abate the
19 endangerment. Any deadline in this Order directly affected by a Stop Work Order
20 under this section shall be extended for the term of the Stop Work Order.

21 3.7. Liability: Nothing in this Order shall constitute or be
22 construed as a satisfaction or release from liability for any conditions or
23 claims arising as a result of past, current, or future operations of
24 Respondents. Notwithstanding compliance with the terms of this Order,
25 Respondents may be required to take further actions as are necessary to
26 protect public health or welfare or the environment.

27 /////

1 3.8. Site Access: Access to the Site shall be provided at all reasonable
2 times to employees, contractors, and consultants of the Department, and any
3 agency having jurisdiction. Nothing in this Order is intended to limit in any
4 way the right of entry or inspection that any agency may otherwise have by
5 operation of any law. The Department and its authorized representatives shall
6 have the authority to enter and move freely about all property at the Site at
7 all reasonable times for purposes including but not limited to: inspecting
8 records, operating logs, and contracts relating to the Site; reviewing the
9 progress of Respondents in carrying out the terms of this Order; and conducting
10 such tests as the Department may deem necessary. Respondents shall permit such
11 persons to inspect and copy all records, documents, and other writings,
12 including all sampling and monitoring data, in any way pertaining to work
13 undertaken pursuant to this Order.

14 3.9. Sampling, Data, and Document Availability. Respondents shall permit
15 the Department and its authorized representatives to inspect and copy all
16 sampling, testing, monitoring, and other data generated by Respondents or on
17 Respondents' behalf in any way pertaining to work undertaken pursuant to this
18 Order. Respondents shall allow the Department and its authorized
19 representatives to take duplicates of any samples collected by Respondents
20 pursuant to this Order. Respondents shall maintain a central depository of the
21 data, reports, and other documents prepared pursuant to this Order. All such
22 data, reports, and other documents shall be preserved by Respondent for a
23 minimum of six years after the conclusion of all activities under this Order.
24 If the Department requests that some or all of these documents be preserved for
25 a longer period of time, Respondent shall either comply with that request,
26 deliver the documents to the Department, or permit the Department to copy the
27 documents prior to destruction. Respondent shall notify the Department in

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1 writing at least six months prior to destroying any documents prepared pursuant
2 to this Order.

3 3.10. Government Liabilities: The State of California shall not be
4 liable for injuries or damages to persons or property resulting from acts
5 or omissions by Respondents or related parties specified in paragraph 3.16
6 in carrying out activities pursuant to this Order, nor shall the State of
7 California be held as a party to any contract entered into by Respondent or its
8 agents in carrying out activities pursuant to the Order.

9 3.11. Additional Enforcement Actions: By issuance of this Order, the
10 Department does not waive the right to take further enforcement actions.

11 3.12. Incorporation of Plans and Reports. All plans, schedules, and
12 reports that require Department approval and are submitted by Respondent
13 pursuant to this Order are incorporated in this Order upon approval by the
14 Department.

15 3.13. Extension Request: If Respondent is unable to perform any activity
16 or submit any document within the time required under this Order, the Respondent
17 may, prior to expiration of the time, request an extension of time in writing.
18 The extension request shall include a justification for the delay.

19 3.14. Extension Approvals: If the Department determines that good
20 cause exists for an extension, it will grant the request and specify in
21 writing a new compliance schedule.

22 3.15. Penalties for Noncompliance: Failure to comply with the terms
23 of this Order may also subject Respondent to costs, penalties, and/or
24 punitive damages for any costs incurred by the Department or other
25 government agencies as a result of such failure, as provided by HSC section
26 25188 and other applicable provisions of law.

27 /////

3.16. Parties Bound: This Order shall apply to and be binding upon Respondents, and the officers, directors, agents, employees, contractors, consultants, receivers, trustees, successors, and assignees, including but not limited to individuals, partners, and subsidiary and parent corporations, of Respondent, and upon any successor agency of the State of California that may have responsibility for and jurisdiction over the subject matter of this Order.

PENALTY

4. Based on the foregoing DETERMINATION OF VIOLATIONS, the Department sets the amount of Respondent's total proposed penalty at \$14,000.00.

RIGHT TO A HEARING

5. You may request a hearing to challenge the Order and Complaint.
Appeal procedures are described in the attached Statement to Respondents.

EFFECTIVE DATE

6.1. Effective ten days from date of service: This Order and Complaint is final and effective ten days from the date it is served on you, unless you request a hearing within the ten-day period.

TIME PERIODS

7. "Days" for purposes of this Order and Complaint means calendar days.

Date of Issuance *November 5, 1991*

Dani De La

Dennis A. Dickerson, Administrator
Region 3
Department of Toxic Substances Control

cc: (see next page)

1 cc: Mr. William Soo Hoo
2 Assistant Chief Counsel
3 Toxics Legal Office
4 Department of Toxic Substances Control
5 714/744 "P" Street
6 P. O. Box 942732
7 Sacramento, CA 94234-7320
8
9 Ms. Mary Locke, Chief
10 Office of Local Enforcement
11 Department of Toxic Substances Control
12 714/744 "P" Street
13 P. O. Box 942732
14 Sacramento, CA 94234-7320
15
16 Mr. Val Siebal
17 Regional Administrator
18 Region 1 (Sacramento)
19 Department of Toxic Substances Control
20 10151 Croydon Way
21 Sacramento, CA 95827
22
23 Mr. Howard Hatayama
24 Regional Administrator
25 Region 2 (Emeryville)
26 Department of Toxic Substances Control
27 2151 Berkeley Way, Annex 7
Berkeley, CA 94704

Mr. John A. Hinton
Regional Administrator
Region 4 (Long Beach)
Department of Toxic Substances Control
245 West Broadway, Suite 350
Long Beach, CA 90802

Mr. Don Johnson, Chief
HQ's Surveillance and Enforcement Unit
Department of Toxic Substances Control
714/744 "P" Street
P. O. Box 942732
Sacramento, CA 94234-7320

Mr. Frank Laguna, Chief
Waste Compliance Branch (W-4-2)
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

/////
/////
/////
/////

Mr. Anastacio Medina, Chief
Hazardous Waste Control Program
Los Angeles County
Department of Health Services
2615 South Grand Avenue, 6th Floor
Los Angeles, CA 90007

Mr. Robert P. Ghirelli
Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
101 Center Plaza Drive
Monterey Park, CA 91754-2156

Ms. Theodora Berger,
Assistant Attorney General
Environmental Law Section
Department of Justice
300 South Spring Street
North Tower, 11th Floor
Los Angeles, CA 90013

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1 STATE OF CALIFORNIA
2 ENVIRONMENTAL PROTECTION AGENCY
3 DEPARTMENT OF TOXIC SUBSTANCES CONTROL

4 In the Matter of:) Docket No. HWCA 91/92-011
5)
6 The Marquardt Company) STATEMENT TO RESPONDENT
7 16555 Saticoy Street)
8 Van Nuys, CA 91409) (First Amended Corrective Action
9) Order and/or Complaint for
10) Penalty)
11 Respondent.)
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10 TO THE ABOVE RESPONDENT:

11 First Amended Corrective Action Order and/or Complaint
12 for Penalty (Order/Complaint) is attached to this statement and is
13 hereby served upon you. The Order/Complaint has been filed by the
14 Department of Toxic Substances Control (Department).

15 Unless a written request for a hearing signed by you or
16 on your behalf is delivered or mailed to the Department within ten
17 days after you received a copy of the Order/Complaint, you will be
18 deemed to have waived your right to a hearing in this matter. If
19 you do not file a timely hearing request, the Corrective Action
20 Order becomes final automatically and the Department will issue an
21 Order Setting Penalty, which will set the penalty in the amount
22 proposed in the Complaint for Penalty.

23 The request for a hearing may be made by delivering or
24 mailing one copy of the enclosed form entitled "Notice of Defense"
25 or by delivering or mailing a Notice of Defense as provided in
26 section 11506 of the Government Code to:

1 William F. Soo Hoo
2 Assistant Chief Counsel
3 Office of Legal Services
4 Toxic Substances Control Division
5 714/744 P Street
6 P. O. Box 942732
7 Sacramento, CA 94234-7320

8 The enclosed Notice of Defense, if signed and filed
9 with the Department, is deemed a specific denial of all parts of
10 the Order/Complaint, but you will not be permitted to raise any
11 objection to the form of the Order/Complaint unless you file a
12 further Notice of Defense as provided in section 11506 of the
13 Government Code within ten days after service of the
14 Order/Complaint upon you.

15 If you file a Notice of Defense within the time
16 permitted, a hearing on the allegations made in the
17 Order/Complaint will be conducted by the Office of
18 Administrative Hearings of the Department of General Services in
19 accordance with the procedures specified in Health and Safety
20 Code sections 25187 and/or 25189.3 and Government Code sections
21 11507 - 11517.

22 The hearing may be postponed for good cause. If you
23 have good cause, you must notify the Department within ten
24 working days after you discover the good cause. Failure to
25 notify the Department within ten days will deprive you of a
26 postponement.

27 Copies of sections 11507.5, 11507.6, and 11507.7 of
the Government Code are attached. If you desire the names and
addresses of witnesses or an opportunity to inspect and copy
items in possession, custody, or control of the Department,
you may contact:

1 William F. Soo Hoo
2 Assistant Chief Counsel
3 Office of Legal Services
4 Toxic Substances Control Division
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8 Whether or not you have a hearing, you may confer
9 informally with the Department to discuss the alleged facts,
10 determinations, and corrective actions. An informal conference
11 does not, however, postpone the ten-day period you have to
12 request a hearing on the Order/Complaint. An informal
13 conference may be pursued simultaneously with the hearing
14 process.

15 You may but are not required to be represented by
16 counsel at any or all stages of these proceedings.
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STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

In the Matter of:)	Docket No. 91/92-011
)	
The Marquardt Company)	NOTICE OF DEFENSE
16555 Saticoy Street)	
Van Nuys, CA 91409)	Health and Safety Code
)	Section 25187(c)
)	
Respondent.)	
_____)	

I, the undersigned Respondent, acknowledge receipt of a copy of the First Amended Corrective Action Order and/or Complaint for Penalty, Statement to Respondent, Government Code sections 11507.5, 11507.6, and 11507.7, and two copies of a Notice of Defense.

I request a hearing to permit me to present my defense to the allegations contained in the Corrective Action Order and/or Complaint for Penalty.

Dated: _____

(Respondent)

Mailing Address of Respondent:

(Street Address)

(City) (State) (Zip)

(Telephone Number)

STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

In the Matter of:) Docket No. 91/92-011
The Marquardt Company) NOTICE OF DEFENSE
16555 Saticoy Street)
Van Nuys, CA 91409) Health and Safety Code
Respondent.) Section 25187(c)

I, the undersigned Respondent, acknowledge receipt of a copy of the Corrective Action Order and/or Complaint for Penalty, Statement to Respondent, Government Code sections 11507.5, 11507.6, and 11507.7, and two copies of a Notice of Defense.

I request a hearing to permit me to present my defense to the allegations contained in the Corrective Action Order and/or Complaint for Penalty.

Dated: _____

Respondent)

Mailing Address of Respondent:

(Street Address)

(City) (State) (Zip)

(Telephone Number)

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

(REGION 3)

1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504
(818) 567-3000

August 12, 1991

CERTIFIED MAILCT Corporation Systems
818 W. 7th Street
Los Angeles, CA 90017

Agent for Service of Process for:

The Marquardt Company
16555 Saticoy Street
Van Nuys, CA 91409

Dear Sirs:

IN THE MATTER OF: DOCKET NUMBER HWCA 91/92-011

Enclosed please find a Complaint for Penalty and related documents concerning violations of Chapter 6.5 of the California Health and Safety Code and Title 22 of the California Code of Regulations.

As indicated in the enclosures, The Marquardt Company has a right to a hearing. Whether or not it chooses to pursue an appeal, it is encouraged to explore the possibility of settlement by contacting Razel Dizon at the above address, or telephone number (818) 567-3109.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dennis Dickerson", is written over a horizontal line.

Dennis Dickerson
Regional Administrator
Region 3 (Burbank)
Dept. of Toxic Substances Control

Enclosures

cc: Sharon Bradley, Environmental Analyst
The Marquardt Company
16555 Saticoy Street
Van Nuys, CA 91409Certified Mail
P 105 727 284
Return Receipt Requested

STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

In the Matter of:) Docket HWCA 91/92-011
)
The Marquardt Company)
16555 Saticoy Street) CORRECTIVE ACTION ORDER AND
7 Van Nuys, CA 91409) COMPLAINT FOR PENALTY
)
) Health and Safety Code
Respondent) Sections 25187 and 25189.2
)

INTRODUCTION

1.1. Parties. The California Environmental Protection Agency, Department of Toxic Substances Control (Department) issues this Corrective Action Order and Complaint for Penalty (Order) to The Marquardt Company, (Respondent).

1.2. Site. Respondent generates, handles, treats, stores, and/or disposes of hazardous waste at the following site: 16555 Saticoy Street, Van Nuys, California 91409 (Site).

1.3. Permit/Interim Status. The Department authorized Respondent to manage hazardous waste by Interim Status Document # CAD044696102 (ISD) issued on April 6, 1981. (Exhibit 1)

1.4. Jurisdiction. Section 25187 of the Health and Safety Code (HSC) authorizes the Department to issue an Order when the Department determines that any person has violated, is violating, or threatens to violate specified provisions of the Health and Safety Code or any permit, rule, regulation, standard, or requirement issued or adopted pursuant thereto. HSC section 25189.2 authorizes the Department to issue a Complaint and to impose a

1 penalty on persons who commit specified acts, pursuant to the
2 procedures set forth in HSC section 25189.3.

3 1.5. Exhibits. All exhibits attached to this Order and
4 Complaint are incorporated herein by this reference.

5 DETERMINATION OF VIOLATIONS

6 2. The Department has determined that the Respondent has
7 violated, is violating, or threatens to violate HSC section 25189.2
8 and other specified provisions as follows:

9 2.1. On or about January 31, 1991, Respondent violated Health
10 and Safety Code, Section 25189.2 (c) by disposing of hazardous waste
11 in the soil in an area north of the hazardous waste storage area
12 resulting in hazardous waste levels of chromium and nickel in the
13 soil.

14 2.2. On January 29, 1991, Respondent violated title 22, Cal.
15 Code Regs., section 66508 (a) (2) [presently title 22, Cal. Code
16 Regs., section 66262.34 (a) (2)], by storing one container and one
17 fifty-five-gallon drum identified by Costano as containing hazardous
18 waste with no accumulation start dates.

19 2.3. On January 29, 1991, Respondent violated title 22, Cal.
20 Code Regs., section 67243 (a) [presently title 22, Cal. Code Regs.,
21 section 66265.173 (a)], by storing one open fifty-five-gallon drum
22 of hazardous waste in the area north of Building 109. The other
23 drum contained filter cake with hazardous waste levels of chromium.

24 2.4. On February 8, 1991, Respondent violated title 22, Cal.
25 Code Regs. Section 67141 (d) [presently title 22, Cal. Code Regs.,
26 section 66264.52 (d)], by not identifying in a contingency plan the
27 primary emergency coordinator and/or other persons qualified to act

1 as emergency coordinators, as well as the home addresses and phone
2 numbers of all persons qualified to act as emergency coordinators.

3 2.5 On February 8, 1991, Respondent violated title 22, Cal.
4 Code Regs., section 67141(c) [presently title 22, Cal. Code Regs.,
5 section 66264.52 (c)], by failing to describe in a contingency plan
6 the arrangements agreed to by local police departments, fire
7 departments, hospitals, contractors and state and local emergency
8 response teams to coordinate emergency services.

9 2.6. On February 8, 1991, Respondent violated title 22, Cal.
10 Code Regs., section 66481(b) [presently title 22, Cal. Code Regs.,
11 section 66262], by having twelve hazardous waste manifests that were
12 not accurately and completely filled out.

13 2.7. On February 8, 1991, Respondent violated title 22, Cal.
14 Code Regs. section 67105 (d) (3) [presently title 22, Cal. Code
15 Regs., section 66264.16 (d) (3)], by not having a written
16 description of the type and amount of both introductory and
17 continuous training that will be given to each person filling a
18 position related to hazardous waste management.

19 SCHEDULE FOR COMPLIANCE

20 3. Based on the foregoing DETERMINATION OF VIOLATIONS, IT IS
21 HEREBY ORDERED THAT:

22 3.1.1. On the effective date of this Order, Respondent shall
23 characterize the extent of the contamination, and remediate all
24 involved areas of contaminated soil. Marquardt shall develop a work
25 plan which will define the areas to be sampled, the rationale for
26 that selection and a remediation plan which will meet the
27 Department's guidelines and approval.

1 3.1.2. On the effective date of this Order, Respondent shall
2 clearly fill out all hazardous waste labels including accumulation
3 start dates.

4 3.1.3. On the effective date of this Order, Respondent shall
5 properly store, secure, and maintain all hazardous waste drums
6 including the two open fifty-five gallon drums located to the north
7 of Building 109.

8 3.1.4. On the effective date of this Order, Respondent shall
9 list in a contingency plan the home address for the primary
10 emergency coordinator or other persons qualified to act as emergency
11 coordinators. Respondent shall also specify in a contingency plan
12 the emergency coordinator and/or alternates.

13 3.1.5. On the effective date of this Order, Respondent shall
14 describe in a contingency plan the arrangements agreed to by local
15 police departments, fire department, hospitals, contractors and
16 state and local emergency response teams to coordinate emergency
17 services.

18 3.1.6. On the effective date of this Order, Respondent shall
19 accurately fill out and complete all hazardous waste manifests.

20 3.1.7. On the effective date of this Order, Respondent shall
21 provide to the Department a written description of the type and
22 amount of both introductory and continuous training that will be
23 given to each person filling a position related to hazardous waste
24 management.

25 3.2. Submittals. All submittals from Respondents pursuant to
26 this Order shall be sent simultaneously to:

27

1
2 Dennis Dickerson, Administrator
3 Region 3
4 CAL-EPA
5 Department of Toxic Substances Control
1405 N. San Fernando Boulevard, Suite 300
Burbank, CA 91504

6 Robert Ghirelli,
7 Executive Officer
8 Regional Water Quality Control Board
Los Angeles Region
101 Center Plaza Drive
Monterey Park, CA 91754-2156

9 Anastacio Medina, Chief
10 Hazardous Waste Control Program
Los Angeles County
11 Department of Health Services
2615 South Grand Avenue, 6th Floor
12 Los Angeles, CA 90007

13 3.3. Communications. All approvals and decisions of the
14 Department made regarding submittals and notifications will be
15 communicated to Respondent in writing by a Branch Chief, Department
16 of Toxic Substances Control, Region 3, or his/her designee. No
17 informal advice, guidance, suggestions, or comments by the
18 Department regarding reports, plans, specifications, schedules, or
19 any other writings by Respondents shall be construed to relieve
20 Respondent of the obligation to obtain such formal approvals as may
21 be required.

22 3.4. Department Review and Approval. If the Department
23 determines that any report, plan, schedule, or other document
24 submitted for approval pursuant to this Order fails to comply with
25 the Corrective Action Order or fails to protect public health or
26 safety or the environment, the Department may:

27 /////

1 a. Modify the document as deemed necessary and approve the
2 document as modified or

3 b. Return the document to Respondents with recommended changes
4 and a date by which Respondent must submit to the Department a
5 revised document incorporating the recommended changes.

6 3.5. Compliance with Applicable Laws: Respondent shall carry
7 out this Order in compliance with all local, State, and federal
8 requirements, including but not limited to requirements to obtain
9 permits and to assure worker safety.

10 3.6. Endangerment during Implementation: In the event that the
11 Department determines that any circumstances or activity (whether
12 or not pursued in compliance with this Order) are creating an
13 imminent or substantial endangerment to the health or welfare of
14 people at the Site or in the surrounding area or to the environment,
15 the Department may order Respondents to stop further implementation
16 of this Order for such period of time as needed to abate the
17 endangerment. Any deadline in this Order directly affected by a
18 Stop Work Order under this section shall be extended for the term
19 of the Stop Work Order.

20 3.7. Liability: Nothing in this Order shall constitute or be
21 construed as a satisfaction or release from liability for any
22 conditions or claims arising as a result of past, current, or future
23 operations of Respondents. Notwithstanding compliance with the
24 terms of this Order, Respondents may be required to take further
25 actions as are necessary to protect public health or welfare or the
26 environment.

27 /////

1 3.8. Site Access: Access to the Site shall be provided at all
2 reasonable times to employees, contractors, and consultants of the
3 Department, and any agency having jurisdiction. Nothing in this
4 Order is intended to limit in any way the right of entry or
5 inspection that any agency may otherwise have by operation of any
6 law. The Department and its authorized representatives shall have
7 the authority to enter and move freely about all property at the
8 Site at all reasonable times for purposes including but not limited
9 to: inspecting records, operating logs, and contracts relating to
10 the Site; reviewing the progress of Respondents in carrying out the
11 terms of this Order; and conducting such tests as the Department may
12 deem necessary. Respondents shall permit such persons to inspect and
13 copy all records, documents, and other writings, including all
14 sampling and monitoring data, in any way pertaining to work
15 undertaken pursuant to this Order.

16 3.9. Sampling, Data, and Document Availability. Respondents
17 shall permit the Department and its authorized representatives to
18 inspect and copy all sampling, testing, monitoring, and other data
19 generated by Respondents or on Respondents' behalf in any way
20 pertaining to work undertaken pursuant to this Order. Respondents
21 shall allow the Department and its authorized representatives to
22 take duplicates of any samples collected by Respondents pursuant to
23 this Order. Respondents shall maintain a central depository of the
24 data, reports, and other documents prepared pursuant to this Order.
25 All such data, reports, and other documents shall be preserved by
26 Respondent for a minimum of six years after the conclusion of all
27 activities under this Order. If the Department requests that some

1 or all of these documents be preserved for a longer period of time,
2 Respondent shall either comply with that request, deliver the
3 documents to the Department, or permit the Department to copy the
4 documents prior to destruction. Respondent shall notify the
5 Department in writing at least six months prior to destroying any
6 documents prepared pursuant to this Order.

7 3.10. Government Liabilities: The State of California shall
8 not be liable for injuries or damages to persons or property
9 resulting from acts or omissions by Respondents or related parties
10 specified in paragraph 3.16 in carrying out activities pursuant to
11 this order, nor shall the State of California be held as a party to
12 any contract entered into by Respondent or its agents in carrying
13 out activities pursuant to the Order.

14 3.11. Additional Enforcement Actions: By issuance of this
15 Order, the Department does not waive the right to take further
16 enforcement actions.

17 3.12. Incorporation of Plans and Reports. All plans,
18 schedules, and reports that require Department approval and are
19 submitted by Respondent pursuant to this Order are incorporated in
20 this Order upon approval by the Department.

21 3.13. Extension Request: If Respondent is unable to perform
22 any activity or submit any document within the time required under
23 this Order, the Respondent may, prior to expiration of the time,
24 request an extension of time in writing. The extension request
25 shall include a justification for the delay.

3.14. Extension Approvals: If the Department determines that good cause exists for an extension, it will grant the request and specify in writing a new compliance schedule.

3.15. Penalties for Noncompliance: Failure to comply with the terms of this Order may also subject Respondent to costs, penalties, and/or punitive damages for any costs incurred by the Department or other government agencies as a result of such failure, as provided by HSC section 25188 and other applicable provisions of law.

3.16. Parties Bound: This Order shall apply to and be binding upon Respondents, and the officers, directors, agents, employees, contractors, consultants, receivers, trustees, successors, and assignees, including but not limited to individuals, partners, and subsidiary and parent corporations, of Respondent, and upon any successor agency of the State of California that may have responsibility for and jurisdiction over the subject matter of this Order.

PENALTY

4. Based on the foregoing DETERMINATION OF VIOLATIONS, the Department sets the amount of Respondent's total proposed penalty at \$36,000.00.

RIGHT TO A HEARING

5. You may request a hearing to challenge the Order and Complaint. Appeal procedures are described in the attached Statement to Respondents.

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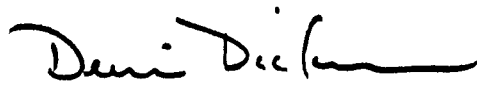
EFFECTIVE DATE

6.1. Effective ten days from date of service: This Order and Complaint is final and effective ten days from the date it is served on you, unless you request a hearing within the ten-day period.

TIME PERIODS

7. "Days" for purposes of this Order and Complaint means calendar days.

Date of Issuance August 8, 1991.



Dennis A. Dickerson, Administrator
Region 3
Department of Toxic Substances Control

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bcc: Mr. William Soo Hoo
Assistant Chief Counsel
Toxics Legal Office
Department of Toxic Substances Control
714/744 "P" Street
P. O. Box 942732
Sacramento, CA 94234-7320

Ms. Mary Locke, Chief
Office of Local Enforcement
Department of Toxic Substances Control
714/744 "P" Street
P. O. Box 942732
Sacramento, CA 94234-7320

Mr. Val Siebal
Regional Administrator
Region 1 (Sacramento)
Department of Toxic Substances Control
10151 Croydon Way
Sacramento, CA 95827

Mr. Howard Hatayama
Regional Administrator
Region 2 (Emeryville)
Department of Toxic Substances Control
2151 Berkeley Way, Annex 7
Berkeley, CA 94704

Mr. John A. Hinton
Regional Administrator
Region 4 (Long Beach)
Department of Toxic Substances Control
245 West Broadway, Suite 350
Long Beach, CA 90802

Mr. Don Johnson, Chief
HQ's Surveillance and Enforcement Unit
Department of Toxic Substances Control
714/744 "P" Street
P. O. Box 942732
Sacramento, CA 94234-7320

Mr. Frank Laguna, Chief
Waste Compliance Branch (W-4-2)
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

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Mr. Anastacio Medina, Chief
Hazardous Waste Control Program
Los Angeles County
Department of Health Services
2615 South Grand Avenue, 6th Floor
Los Angeles, CA 90007

Mr. Robert P. Ghirelli
Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
101 Center Plaza Drive
Monterey Park, CA 91754-2156

Ms. Theodora Berger,
Assistant Attorney General
Environmental Law Section
Department of Justice
300 South Spring Street
North Tower, 11th Floor
Los Angeles, CA 90013

1
2 STATE OF CALIFORNIA
3 ENVIRONMENTAL PROTECTION AGENCY
4 DEPARTMENT OF TOXIC SUBSTANCES CONTROL

4 In the Matter of:) Docket No. HWCA 91/92-011
5)
5 The Marquardt Company) STATEMENT TO RESPONDENT
16555 Saticoy Street)
6 Van Nuys, CA 91409) (Corrective Action and/or
7) Complaint for Penalty)
8 Respondent.)
9)

10 TO THE ABOVE RESPONDENT:

11 A Corrective Action Order and/or Complaint for Penalty
12 (Order/Complaint) is attached to this statement and is hereby
13 served upon you. The Order/Complaint has been filed by the
14 State of California Environmental Protection Agency, Department of
15 Toxics Substances Control (Department).

16 Unless a written request for a hearing signed by you or
17 on your behalf is delivered or mailed to the Department within ten
18 days after you received a copy of the Order/Complaint, you will be
19 deemed to have waived your right to a hearing in this matter. If
20 you do not file a timely hearing request, the Corrective Action
21 Order becomes final automatically and the Department will issue an
22 Order Setting Penalty, which will set the penalty in the amount
23 proposed in the Complaint for Penalty.

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2 Assistant Chief Counsel
3 Office of Legal Services
4 Department of Toxic Substances Control
5 714/744 P Street
6 P. O. Box 942732
7 Sacramento, CA 94234-7320

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9 the Department, is deemed a specific denial of all parts of the
10 Order/Complaint, but you will not be permitted to raise any
11 objection to the form of the Order/Complaint unless you file a
12 further Notice of Defense as provided in section 11506 of the
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4 Assistant Chief Counsel
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6 Department of Toxic Substances Control
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9 Sacramento, Ca 94234-7320

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17 You may but are not required to be represented by
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DEPARTMENT OF HEALTH SERVICES
714/744 P STREET
SACRAMENTO, CA 95814



Facility: The Marquardt Company)
16555 Saticoy Street)
Los Angeles County)
Van Nuys, CA 91406)

INTERIM STATUS DOCUMENT

Number: CAD 044696102

Effective Date: April 6, 1981

Operator: The Marquardt Company)
P.O. Box 2013 South Annex)
Van Nuys, CA 91409)

Pursuant to Section 25200.5 of the California Health and Safety Code,
this Interim Status Document is hereby granted to The Marquardt Company
subject to the conditions set forth in Attachment A which by this
reference is incorporated herein.

Harvey F. Collins
Harvey F. Collins, Ph.D., Chief
Environmental Health Branch

ATTACHMENT A

Interim Status Document

The Marquardt Company
16555 Saticoy Street
Los Angeles County
Van Nuys, CA 91406

I. GENERAL CONDITIONS

1. Identification and general responsibilities of operator.

The Marquardt Company, hereinafter called the operator and/or owner, shall comply with the provisions of the California Health and Safety Code, including Chapter 6.5 of Division 20, and with the Minimum Standards for Management of Hazardous and Extremely Hazardous Wastes (Chapter 30, Division 4, Title 22 of the California Administrative Code). The following requirements set forth in Chapter 30, Division 4, Title 22, California Administrative Code, should be particularly noted:

- (a) The owner or operator shall ensure that the operation of the facility will not imperil public health and safety, wildlife, domestic livestock, or the environment.
- (b) The owner or operator shall allow the California State Department of Health Services or the local health agency to inspect the facility, take samples of wastes, and inspect pertinent records.
- (c) The owner or operator shall maintain the qualified personnel and the equipment necessary to provide for the safe operation of the facility.
- (d) The owner or operator shall notify the California State Department of Health Services of a proposed change in ownership of the facility, in the method of operation of the facility, or of proposed closure of the facility 30 days prior to such event.
- (e) The operator shall report to the California State Department of Health Services, within 24 hours after occurrence, all accidents involving hazardous wastes which resulted in, or could have resulted in, a hazard to public health and safety, wildlife, domestic livestock, or to the environment.

2. Records.

The owner or operator shall file this Interim Status Document at the facility and at his place of business.

3. Operation plan.

Unless he has already done so, the owner or operator shall submit to the California State Department of Health Services within six months of the effective date of this document, an operation plan in accordance with Section 66376, Title 22 of the California Administrative Code.

4. Prohibited acts.

The owner or operator shall not do any of the following acts:

- (a) Treat, store, or dispose of hazardous wastes which are not identified.
- (b) Employ processes not described in the application.
- (c) Make substantial modifications or additions to the facility.

5. Limitation.

The owner or operator shall comply with the conditions of this document and with any new or modified conditions which the California State Department of Health Services deems necessary to protect public health or the environment. A new interim status condition or a modification of an existing interim status condition shall become effective on the date that written notice of such change is received by the owner or operator.

NOTE: Unless explicitly stated otherwise, all cross references to items in this Interim Status Document shall refer only to items occurring within the same Part. All Parts are identified by Roman numerals. The items set forth in each Part shall apply to the owner, operator, and/or facility in addition to the items set forth in any preceding and/or following Part of this document.

II. SPECIAL CONDITIONS

1. Storage of wastes.

- (a) Hazardous waste shall not be stored at the facility for longer than one year without written approval from the California State Department of Health Services.
- (b) If a hazardous waste is stored at the facility longer than one year, the owner or operator shall pay to the California State Department of Health Services a fee, as if the waste had been disposed of on land, in accordance with Article 8, Chapter 30, Division 4, Title 22 of the California Administrative Code. The fee shall be paid in the 13th month of storage.
- (c) Hazardous waste shall be stored in a secure enclosure such as a building, room or fenced area, which shall prevent unauthorized persons from gaining access to the waste and in a manner that will prevent spills. A caution sign shall be posted and visible from any direction of access or view of hazardous waste stored in such enclosure. Wording of caution signs shall be in English, "Caution-Hazardous Waste Storage Area-Unauthorized Persons Keep Out", and Spanish, "Cuidado! Zona de Residuos Peligrosos. Prohibida la Entrada a Personas No Autorizadas".
- (d) Each hazardous waste storage area shall have a continuous base that is impervious to the waste to be stored and shall be designed and constructed so that any surface water runoff or spills can be contained.

2. Storage in tanks.

- (a) Each hazardous waste storage tank situated above ground shall have a spill confinement structure (e.g., dike or trough) capable of holding the entire contents of the tank plus sufficient freeboard.
- (b) Hazardous waste storage tanks shall be constructed of materials which are compatible with the wastes to be contained or shall be protected by liners which are compatible with those wastes.
- (c) Prior to use, hazardous waste storage tanks and their appurtenances shall be certified by an engineer registered in California to be structurally sound and of adequate construction for the intended use.
- (d) Each hazardous waste storage tank and storage area shall be individually marked with the internationally recognized hazard

identification system placards developed by the National Fire Prevention Association (NFPA).

- (e) Valves on hazardous waste storage tanks shall be kept locked when the facility is unattended.

3. Storage in containers.

- (a) Containers used for storing hazardous waste shall be in a condition such that the containers can be safely transported, handled or moved.
- (b) Areas used for storing containers of hazardous waste shall be widely separated, or physical barriers shall be provided to ensure that commingling of incompatible hazardous wastes cannot occur if a container on one pad ruptures.
- (c) A label shall be maintained on all containers in which hazardous wastes are stored for 90 days or more and records for the storage of all hazardous wastes shall be maintained pursuant to Section 66545, Title 22 of the California Administrative Code. Labels shall include the following information:
 - (1) Composition and physical state of the waste;
 - (2) Special safety recommendations and precautions for handling the waste;
 - (3) Statement or statements which call attention to the particular hazardous properties of the waste;
 - (4) Amount of waste and name and address of the person producing the waste; and
 - (5) Date of acceptance at the storage facility.
- (d) Empty containers contaminated with hazardous materials shall be stored, handled, processed and disposed of as hazardous wastes.

4. Wastes prohibited.

Hazardous wastes described below shall not be handled at the facility:

- (a) Extremely hazardous wastes as defined in Sections 66064 and 66685, Title 22, California Administrative Code, unless specifically approved by a written permit from the California State Department of Health Services.

- (b) Flammable wastes and water-reactive wastes as defined in Sections 66072 and 66236, respectively, Title 22 of the California Administrative Code.
- (c) Burning wastes.
- (d) Forbidden and Class A explosives as defined in Sections 173.51 and 173.53, Title 49, Code of Federal Regulations.

5. Management of incompatible wastes.

Each of the following categories of incompatible hazardous wastes shall be adequately separated during all handling, storage, and disposal operations:

- (a) Alkalies and cyanides.
- (b) Acids.

6. Public water supply.

If a public water supply is used at the facility, the service connection shall be protected from contamination as specified in Section 7604, Title 17 of the California Administrative Code.

7. Fencing.

The perimeter of the hazardous waste area of the facility shall be secured by a well-maintained fence, capable of preventing the intrusion of livestock and of discouraging entry by unauthorized persons. If the entire facility is appropriately fenced, if the general public does not have access to the hazardous waste area, and if the hazardous waste area is posted with warning signs as described elsewhere in this document, no additional fence shall be required around the hazardous area unless the absence of such a fence could result in a hazard to health, safety, or the environment.

8. Operation at night.

When the facility is operated during hours of darkness, the operator shall provide sufficient lighting to ensure safe, effective management of hazardous wastes.

9. Warning signs.

Signs indicating that the facility, or the hazardous waste area of the facility, contains hazardous waste shall be placed on the perimeter fence at locations where it is anticipated that hunters and other

trespassers may enter the facility such as at trails, major drainages, and ridges. Wording of the signs shall be in English, "Caution-Hazardous Waste Area-Unauthorized Persons Keep Out", and Spanish, "Cuidado! Zona de Residuos Peligrosos. Prohibida la Entrada a Personas No Autorizadas".

10. Telephone or radio communications.

A telephone or radio for summoning aid in the event of an emergency shall be in workable condition and available for immediate use by personnel working in the hazardous waste area of the facility.

11. Safety showers.

The owner or operator shall provide to personnel working in the hazardous waste area of the facility adequate numbers of safety showers. The safety showers shall be in workable condition and available for immediate use.

12. Eyewashes.

The owner or operator shall provide to personnel working in the hazardous waste area of the facility adequate numbers of eyewashes. The eyewashes shall be in workable condition and available for immediate use.

13. First-aid kit.

The owner or operator shall provide to personnel working in the hazardous waste area of the facility adequate numbers of industrial-type first-aid kits. The kits shall be maintained and available for immediate use.

14. Protective clothing.

The owner or operator shall provide to personnel working in the hazardous waste area of the facility adequate numbers of the following National Institute of Occupational Safety and Health (NIOSH) approved equipment if appropriate:

- (a) Protective head gear and face masks.
- (b) Chemically resistant apparel and gloves.
- (c) Self-contained breathing apparatus and respirators with the approved cartridges.

15. Warning alarm system.

If at any time there is a sole employee on the premises, the employee shall have immediate access to an alarm or other communication device capable of summoning external emergency assistance.

III. SAFETY, EQUIPMENT, AND EMERGENCY RESPONSE

1. Identification number.

The facility owner or operator shall have an identification number issued by the U.S. Environmental Protection Agency (EPA).

2. Notices.

- (a) If the owner or operator has arranged to receive hazardous waste from a foreign source, he shall notify the California State Department of Health Services in writing at least four weeks in advance of the date that the waste is expected to arrive at the facility. Notice of subsequent shipments of the same waste from the same foreign source is not required.
- (b) Before transferring ownership or operation of the facility during its operating life or during the post-closure care period, the owner or operator shall notify the new owner or operator in writing of the conditions of this document.

3. Analysis of waste.

- (a)
 - (1) Before the owner or operator treats, stores, or disposes of a particular type of hazardous waste for the first time, he shall obtain a detailed chemical and physical analysis of a representative sample of the waste. At a minimum, this analysis shall contain all the information which must be known to treat, store, or dispose of the waste in accordance with the conditions of this document.
 - (2) The analysis may include data developed for other purposes, and existing published or documented data on the hazardous waste or on waste generated from similar processes.
 - (3) The analysis shall be repeated as necessary to ensure that it is accurate and up-to-date. At a minimum, the analysis must be repeated when the owner or operator is notified, or has reason to believe, that the process or operation generating the hazardous waste has changed.
- (b) Upon the effective date of this document, the owner or operator shall follow a written waste analysis plan which describes the procedures which will be used to comply with Item 3 (a). The plan shall be subject to approval by the California State Department of Health Services and shall be kept at the facility. At a minimum, the plan shall specify:

- (1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters;
- (2) The test methods which will be used to test for these parameters;
- (3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed. A representative sample may be obtained using either:
 - (i) One of the sampling methods described in Appendix I, Part 261, Title 40, Code of Federal Regulations; or
 - (ii) An equivalent sampling method approved by the California State Department of Health Services.
- (4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date;
- (5) Where applicable, the methods which will be used to meet any additional waste analysis requirements for specific waste management methods as specified elsewhere in this document.

4. Security.

- (a) The owner or operator shall prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock onto the active portion of the facility.
- (b) The facility shall have:
 - (1) A 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; or
 - (2)
 - (i) An artificial or natural barrier which completely surrounds the active portion of the facility and which would prevent unauthorized entry; and
 - (ii) A means to control entry, at all times, through the gates or other entrances to the active portion of the facility (e.g., an attendant, television monitors, locked entrance, or controlled roadway access to the facility).

- (c) Upon the effective date of this document, a sign with the legend, "Caution - Hazardous Waste Area - Unauthorized Persons Keep Out," shall be posted at each entrance to the active portion of the facility, and at other locations, in sufficient numbers to be seen from any approach to this active portion. The legend shall be written in English and Spanish, "Cuidado! Zona De Residuos Peligrosos. Prohibida La Entrada A Personas No Autorizadas", and shall be legible from a distance of at least 25 feet. Existing signs with a legend other than "Caution - Hazardous Waste Area - Unauthorized Persons Keep Out" may be used if the legend on the sign indicates that only authorized personnel are allowed to enter the active portion, and that entry onto the active portion can be dangerous.

5. Inspections.

- (a) The owner or operator shall inspect the facility for malfunctions and deterioration, operator errors, and discharges which may be causing--or may lead to--release of hazardous waste constituents to the environment or a threat to human health. The owner or operator shall conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment.
- (b) (1) The owner or operator shall follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards.
- (2) The schedule shall be subject to approval by the California State Department of Health Services.
- (3) He shall keep this schedule at the facility.
- (4) The schedule shall identify the types of problems (e.g., malfunctions or deterioration) which are to be looked for during the inspection (e.g., inoperative sump pump, leaking fitting, eroding dike, etc.).
- (5) The frequency of inspection may vary for the items on the schedule. However, it shall be based on the rate of

possible deterioration of the equipment and the probability of an environmental or human health incident if the deterioration or malfunction or any operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas shall be inspected daily when in use. At a minimum, the inspection schedule shall include the items and frequencies called for elsewhere in this document.

- (c) The owner or operator shall remedy any deterioration or malfunction of equipment or structures which the inspection reveals on a schedule which shall be subject to approval by the California State Department of Health Services and which shall ensure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately.
- (d) The owner or operator shall record inspections in an inspection log or summary. He shall keep these records for at least three years from the date of inspection. At a minimum, these records shall include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

6. Personnel training.

- (a) (1) Facility personnel shall successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the conditions of this document. The owner or operator shall ensure that this program includes all the elements described under Item 6 (a)(3).
- (2) This program shall be directed by a person trained in hazardous waste management procedures, and shall include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.
- (3) At a minimum, the training program shall be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable:
 - (i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
 - (ii) Key parameters for automatic waste feed cut-off systems;

- (iii) Communications or alarm systems;
 - (iv) Response to fires or explosions;
 - (v) Response to ground-water contamination incidents;
and
 - (vi) Shutdown of operations.
- (b) Facility personnel shall have successfully completed the program required in Item 6 (a) by the effective date of this document or within six months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later. Employees hired after the effective date of this document shall not work in unsupervised positions until they have completed the training requirements of Item 6 (a).
- (c) Facility personnel shall take part in an annual review of the initial training required in Item 6 (a).
- (d) The owner or operator shall maintain the following documents and records at the facility:
- (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
 - (2) A written job description for each position listed under Item 6 (d)(1). This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but shall include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;
 - (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under Item 6 (d) (1); and
 - (4) Records that document that the training or job experience required under Items 6 (a), (b), and (c) has been given to, and completed by, facility personnel.
- (e) Training records on current personnel as required in Item 6 (d) 4 shall be kept until closure of the facility. Training records on former employees shall be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

7. Ignitable, reactive, or incompatible wastes.

- (a) The owner or operator shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste shall be separated and protected from sources of ignition or reaction. While ignitable or reactive waste is being handled, the owner or operator shall confine smoking and open flame to specially designated locations. "No Smoking" signs shall be conspicuously placed wherever there is a hazard from ignitable or reactive waste.
- (b) The treatment, storage, or disposal of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials shall be conducted so that it does not:
 - (1) Generate extreme heat or pressure, fire or explosion, or violent reaction;
 - (2) Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health;
 - (3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;
 - (4) Damage the structural integrity of the device or facility containing the waste; or
 - (5) Through other like means threaten human health or the environment.

8. Maintenance and operation of facility.

The facility shall be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

9. Testing and maintenance of equipment.

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, shall be tested and maintained as necessary to ensure its proper operation in time of emergency.

10. Required aisle space.

The owner or operator shall maintain aisle space as needed to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

11. Arrangements with local authorities.

(a) Upon the effective date of this document, the owner or operator shall attempt to make the following arrangements, as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations:

- (1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;
- (2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;
- (3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and
- (4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

(b) Where State or local authorities decline to enter into such arrangements, the owner or operator shall document the refusal in the operating record.

12. Purpose and implementation of contingency plan.

(a) Upon the effective date of this document, the owner or operator shall have a contingency plan for the facility. The contingency plan shall be subject to approval by the California State Department of Health Services and shall be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

- (b) The provisions of the plan shall be carried out immediately wherever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

13. Content of contingency plan.

- (a) The contingency plan shall describe the actions facility personnel shall take to comply with Items 12 and 17 in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.
- (b) If the owner or operator has already prepared some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the conditions of this document.
- (c) The plan shall describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to Item 13.
- (d) The plan shall list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see Item 18), and this list shall be kept up to date. Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates.
- (e) The plan shall include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list shall be kept up to date. In addition, the plan shall include the location and a physical description of each item on the list, and a brief outline of its capabilities.
- (f) The plan shall include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan shall describe signal(s) to be used to begin evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous wastes or fires).

14. Copies of contingency plan.

A copy of the contingency plan and all revisions to the plan shall be:

(a) Maintained at the facility; and

(b) Submitted to the California State Department of Health Services and to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

15. Amendment of contingency plan.

The contingency plan shall be reviewed, and immediately amended, if necessary, whenever:

(a) Applicable regulations are revised;

(b) The plan fails in an emergency;

(c) The list of emergency coordinators changes; or

(d) The list of emergency equipment changes.

16. Emergency coordinator.

At all times, there shall be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator shall be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, this person shall have the authority to commit the resources needed to carry out the contingency plan.

17. Emergency procedures.

(a) Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) shall:

(1) Immediately activate internal facility alarms or communication systems, where applicable, to notify all facility personnel;

(2) Immediately notify appropriate State or local agencies with designated response roles if their help is needed; and

(3) Notify the California State Department of Health Services by telephone or telegraph within 24 hours of occurrence.

- (b) Whenever there is a release, fire, or explosion, the emergency coordinator shall immediately identify the character, exact source, amount, and areal extent of any released materials. This may be done by observation or review of facility records or manifests and, if necessary, by chemical analysis.
- (c) Concurrently, the emergency coordinator shall assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment shall consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).
- (d) If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, the findings shall be reported as follows:
 - (1) The emergency coordinator shall immediately notify either the government official designated as the on-scene coordinator for that geographical area (in the applicable regional contingency plan under Part 1510, Title 40, Code of Federal Regulations), or the National Response Center (using their 24-hour toll free number: 800/424-8802). The report shall include:
 - (i) Name and telephone number of reporter;
 - (ii) Name and address of facility;
 - (iii) Time and type of incident (e.g., release, fire);
 - (iv) Name and quantity of material(s) involved, to the extent known;
 - (v) The extent of injuries, if any; and
 - (vi) The possible hazards to human health, or the environment, outside the facility.
 - (2) If his assessment indicates that evacuation of local areas may be advisable, appropriate local authorities shall be notified immediately. The emergency coordinator shall be available to help appropriate officials decide whether local areas should be evacuated.
- (e) During an emergency the emergency coordinator shall take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous

waste at the facility. These measures shall include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

- (f) If the facility stops operations in response to a fire, explosion or release, the emergency coordinator shall monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.
- (g) Immediately after an emergency, the emergency coordinator shall provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.
- (h) The emergency coordinator shall ensure that, in the affected area(s) of the facility:
 - (1) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
 - (2) All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.
- (i) The owner or operator shall notify the California State Department of Health Services and local authorities, that the facility is in compliance with Item 17 (h) before operations are resumed in the affected area(s) of the facility.
- (j) The owner or operator shall note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 30 days after the incident, he shall submit a written report on the incident to the California State Department of Health Services. The report shall include:
 - (1) Name, address, and telephone number of the owner or operator;
 - (2) Name, address, and telephone number of the facility;
 - (3) Date, time, and type of incident (e.g., fire, explosion);
 - (4) Name and quantity of material(s) involved;
 - (5) The extent of injuries, if any;

- (6) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- (7) Estimated quantity and disposition of recovered material that resulted from the incident.

IV. RECORDKEEPING

1. Operating record.

- (a) The owner or operator shall keep a written operating record at the facility.
- (b) The following information shall be recorded, as it becomes available, and maintained in the operating record until closure of the facility:
 - (1) A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility;
 - (2) The location of each hazardous waste within the facility and the quantity at each location. This information shall include cross-references to specific manifest document numbers, if the waste was accompanied by a manifest;
 - (3) Records and results of waste analyses and trial tests performed;
 - (4) Summary reports and details of all incidents that require implementing the contingency plan;
 - (5) Records and results of inspections (except these data need be kept only three years);
 - (6) Monitoring, testing or analytical data where required; and
 - (7) All closure cost estimates.

2. Availability, retention, and disposition of records.

- (a) All records including plans, required in this document shall be furnished upon request, and made available at all reasonable times for inspection, by any officer, employee, or representative of the California State Department of Health Services who is duly designated by the Director;
- (b) The retention period for all records required in this document is extended automatically during the course of any unresolved enforcement action regarding the facility or as requested by the California State Department of Health Services;

- (c) A copy of records of waste disposal locations and quantities in Item 1 (b)(2) shall be submitted to the California State Department of Health Services and local land authority upon closure of the facility.

3. Annual report.

The owner or operator shall prepare and submit a single copy of an annual report to the California State Department of Health Services by March 1 of each year beginning March 1, 1982. The annual report shall cover facility activities during the previous calendar year and shall include the following information:

- (a) The EPA identification number, name, and address of the facility;
- (b) The calendar year covered by the report;
- (c) A description and the quantity of each hazardous waste the facility received during the year;
- (d) The method of treatment, storage, or disposal for each hazardous waste;
- (e) Monitoring data where required;
- (f) The most recent closure cost estimate;
- (g) The certification signed by the owner or operator of the facility or his authorized representative.

4. Additional reports.

In addition to submitting the annual report required in Item 3, the owner or operator shall also report to the California State Department of Health Services:

- (a) Releases, fires, and explosions;
- (b) Ground-water contamination and monitoring data;
- (c) Facility closure.

V. CLOSURE

1. Closure.

The owner or operator shall close his facility in a manner that: (a) minimizes the need for further maintenance, and (b) controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground water, or surface waters, or to the atmosphere.

2. Closure plan and amendment of plan.

- (a) The owner or operator shall have a written closure plan. This plan shall be subject to approval by the California Regional Water Quality Control Board and shall be kept at the facility. This plan shall identify the steps necessary to close the facility completely at any point during its intended life and at the end of its intended life. The closure plan shall include, at least:
 - (1) A description of how and when the facility will be partially closed, if applicable, and ultimately closed. The description shall identify the maximum extent of the operation which will be unclosed during the life of the facility, and how Item 1 and other applicable conditions of this document will be met;
 - (2) An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility;
 - (3) A description of the steps needed to decontaminate facility equipment during closure; and
 - (4) A schedule for final closure which shall include, as a minimum, the anticipated date when wastes will no longer be received, the date when completion of final closure is anticipated, and intervening milestone dates which will allow tracking of the progress of closure. (For example, the expected date for completing treatment or disposal of waste inventory shall be included, as must the planned date for removing any residual wastes from storage facilities and treatment processes.)

- (b) The owner or operator may amend his closure plan at any time during the active life of the facility. (The active life of the facility is that period during which wastes are periodically received.) The owner or operator shall amend his plan any time changes in operating plans or facility design affect the closure plan.
- (c) The owner or operator shall submit his closure plan to the California Regional Water Quality Control Board at least 180 days before the date he expects to begin closure. The California Regional Water Quality Control Board will modify, approve, or disapprove the plan within 90 days of receipt and after providing the owner or operator and the affected public (through a newspaper notice) the opportunity to submit written comments.

3. Time allowed for closure.

- (a) Within 90 days after receiving the final volume of hazardous wastes, the owner or operator shall treat all hazardous wastes in storage or in treatment, or remove them from the site, or dispose of them on-site, in accordance with the approved closure plan.
- (b) The owner or operator shall complete closure activities in accordance with the approved closure plan and within six months after receiving the final volume of wastes. The California Regional Water Quality Control Board may approve a longer closure period under Item 2 (c) if the owner or operator can demonstrate that: (1) the required or planned closure activities will, of necessity, take him longer than six months to complete, and (2) that he has taken all steps to eliminate any significant threat to human health and the environment from the unclosed but inactive facility.

4. Disposal or decontamination of equipment.

When closure is completed, all facility equipment and structures shall have been properly disposed of, or decontaminated by removing all hazardous waste and residues.

5. Certification of closure.

When closure is completed, the owner or operator shall submit to the California Regional Water Quality Control Board certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

VI. FINANCIAL RESPONSIBILITY

1. Cost estimate for facility closure.

- (a) The owner or operator shall have a written estimate of the cost of closing the facility in accordance with the applicable closure requirements of this document. The owner or operator shall keep this estimate, and all subsequent estimates, at the facility. The estimate shall equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan.
- (b) The owner or operator shall prepare a new closure cost estimate whenever a change in the closure plan affects the cost of closure.
- (c) On each anniversary of the effective date of this document, the owner or operator shall adjust the latest closure cost estimate using an inflation factor derived from the annual Implicit Price Deflator for Gross National Product as published by the U.S. Department of Commerce in its *Survey of Current Business*. The inflation factor shall be calculated by dividing the latest published annual Deflator by the Deflator for the previous year. The result is the inflation factor. The adjusted closure cost estimate shall equal the latest closure cost estimate (see Item 1(b)) times the inflation factor.

VII. TANKS

1. Operation.

- (a) Treatment or storage of hazardous waste in tanks shall comply with Item 7 (b), Part III of this document.
- (b) Hazardous waste or treatment reagents shall not be placed in a tank if they could cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail before the end of its intended life.
- (c) Uncovered tanks shall be operated to ensure at least 60 centimeters (2 feet) of freeboard, or the tank shall be equipped with a containment structure (e.g., dike or trench), a drainage control system, or a diversion structure (e.g., standby tank) with a capacity that equals or exceeds the volume of the top 60 centimeters (2 feet) of the tank.
- (d) If hazardous waste is continuously fed into a tank, the tank shall be equipped with a means to stop this inflow (e.g., a waste feed-cutoff system or by-pass system to a stand-by tank).

2. Analysis of waste and trial tests.

- (a) If a tank is to be used for:
 - (1) Chemically treating or storing a hazardous waste which is substantially different from waste previously treated or stored in that tank; or
 - (2) Chemically treating hazardous waste with a substantially different process than any previously used in that tank; the owner or operator shall before treating or storing the different waste or using the different process:
 - (i) Conduct waste analyses and trial treatment or storage tests (e.g., bench scale or pilot plant scale tests) to document that this proposed treatment or storage will comply with Items 1(a) and (b); or
 - (ii) Obtain written information on similar storage or treatment of similar waste under similar operating conditions to document that this proposed treatment or storage will comply with Items 1 (a) and (b).

3. Inspections.

- (a) The owner or operator of a tank must inspect, if applicable:
- (1) Discharge control equipment (e.g., waste feed cut-off systems, and drainage systems), at least once each operating day, to ensure that it is in good working order;
 - (2) Data gathered from monitoring equipment (e.g., pressure and temperature gauges), at least once each operating day, to ensure that the tank is being operated according to its design;
 - (3) The level of waste in the tank, at least once each operating day, to ensure compliance with Item 1 (c);
 - (4) The construction materials of the tank, at least weekly, to detect corrosion or leaking of fixtures or seams; and
 - (5) The construction materials of, and the area immediately surrounding, discharge confinement structures (e.g., dikes), at least weekly, to detect erosion or obvious signs of leakage (e.g., wet spots or dead vegetation).

4. Closure.

At closure, all hazardous waste and hazardous waste residues shall be removed from tanks, discharge control equipment, and discharge confinement structures.

5. Ignitable or reactive waste.

- (a) Ignitable or reactive waste shall not be placed in a tank, unless:
- (1) The waste is treated, rendered, or mixed before or immediately after placement in the tank so that the resulting waste, mixture, or dissolution of material is no longer ignitable or reactive and Item 7 (b), Part III of this document is complied with; or
 - (2) The waste is stored or treated in such a way that it is protected from any material or conditions which may cause the waste to ignite or react; or
 - (3) The tank is used solely for emergencies.
- (b) If the owner or operator treats or stores ignitable or reactive waste in covered tanks, he shall comply with the National Fire Protection Association's (NFPA's) buffer zone requirements for tanks, contained in Tables 2-1 through 2-6 of the "Flammable and Combustible Code--1977".

6. Incompatible Wastes.

- (a) Incompatible wastes, or incompatible wastes and materials, shall not be placed in the same tank, unless Item 7 (b), Part III of this document is complied with.
- (b) Hazardous waste shall not be placed in an unwashed tank which previously held an incompatible waste or material.

VIII. STORAGE OF CONTAINERS

1. Condition.

If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator shall transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the conditions of this document.

2. Compatibility of waste.

The owner or operator shall use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

3. Management.

- (a) A container holding hazardous waste shall remain closed during storage, except when it is necessary to add or remove waste.
- (b) A container holding hazardous waste shall not be opened, handled, or stored in a manner which might rupture the container or cause it to leak.

4. Inspections.

The owner or operator shall inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

5. Ignitable or reactive waste.

Containers holding ignitable or reactive waste shall be situated at least 15 meters (50 feet) from the property line of the facility.

6. Incompatible wastes.

- (a) Incompatible wastes, or incompatible wastes and materials, shall not be placed in the same container, unless the requirements of Item 7 (b), Part III of this document are met.
- (b) Hazardous waste shall not be placed in an unwashed container that previously held an incompatible waste or material unless the requirements of Item 7 (b), Part III of this document are met.

- (c) A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments shall be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET
SACRAMENTO, CA 95814



Facility: The Marquardt Company)
16555 Saticoy Street)
Los Angeles County)
Van Nuys, CA 91406)

INTERIM STATUS DOCUMENT

Number: CAD 044696102

Effective Date: April 6, 1981

Operator: The Marquardt Company)
P.O. Box 2013 South Annex)
Van Nuys, CA 91409)

Pursuant to Section 25200.5 of the California Health and Safety Code, this Interim Status Document is hereby granted to The Marquardt Company subject to the conditions set forth in Attachment A which by this reference is incorporated herein.

Harvey F. Collins
Harvey F. Collins, Ph.D., Chief
Environmental Health Branch

ATTACHMENT A

Interim Status Document

The Marquardt Company
16555 Saticoy Street
Los Angeles County
Van Nuys, CA 91406

I. GENERAL CONDITIONS

1. Identification and general responsibilities of operator.

The Marquardt Company, hereinafter called the operator and/or owner, shall comply with the provisions of the California Health and Safety Code, including Chapter 6.5 of Division 20, and with the Minimum Standards for Management of Hazardous and Extremely Hazardous Wastes (Chapter 30, Division 4, Title 22 of the California Administrative Code). The following requirements set forth in Chapter 30, Division 4, Title 22, California Administrative Code, should be particularly noted:

- (a) The owner or operator shall ensure that the operation of the facility will not imperil public health and safety, wildlife, domestic livestock, or the environment.
- (b) The owner or operator shall allow the California State Department of Health Services or the local health agency to inspect the facility, take samples of wastes, and inspect pertinent records.
- (c) The owner or operator shall maintain the qualified personnel and the equipment necessary to provide for the safe operation of the facility.
- (d) The owner or operator shall notify the California State Department of Health Services of a proposed change in ownership of the facility, in the method of operation of the facility, or of proposed closure of the facility 30 days prior to such event.
- (e) The operator shall report to the California State Department of Health Services, within 24 hours after occurrence, all accidents involving hazardous wastes which resulted in, or could have resulted in, a hazard to public health and safety, wildlife, domestic livestock, or to the environment.

2. Records.

The owner or operator shall file this Interim Status Document at the facility and at his place of business.

3. Operation plan.

Unless he has already done so, the owner or operator shall submit to the California State Department of Health Services within six months of the effective date of this document, an operation plan in accordance with Section 66376, Title 22 of the California Administrative Code.

4. Prohibited acts.

The owner or operator shall not do any of the following acts:

- (a) Treat, store, or dispose of hazardous wastes which are not identified.
- (b) Employ processes not described in the application.
- (c) Make substantial modifications or additions to the facility.

5. Limitation.

The owner or operator shall comply with the conditions of this document and with any new or modified conditions which the California State Department of Health Services deems necessary to protect public health or the environment. A new interim status condition or a modification of an existing interim status condition shall become effective on the date that written notice of such change is received by the owner or operator.

NOTE: Unless explicitly stated otherwise, all cross references to items in this Interim Status Document shall refer only to items occurring within the same Part. All Parts are identified by Roman numerals. The items set forth in each Part shall apply to the owner, operator, and/or facility in addition to the items set forth in any preceding and/or following Part of this document.

II. SPECIAL CONDITIONS

1. Storage of wastes.

- (a) Hazardous waste shall not be stored at the facility for longer than one year without written approval from the California State Department of Health Services.
- (b) If a hazardous waste is stored at the facility longer than one year, the owner or operator shall pay to the California State Department of Health Services a fee, as if the waste had been disposed of on land, in accordance with Article 8, Chapter 30, Division 4, Title 22 of the California Administrative Code. The fee shall be paid in the 13th month of storage.
- (c) Hazardous waste shall be stored in a secure enclosure such as a building, room or fenced area, which shall prevent unauthorized persons from gaining access to the waste and in a manner that will prevent spills. A caution sign shall be posted and visible from any direction of access or view of hazardous waste stored in such enclosure. Wording of caution signs shall be in English, "Caution-Hazardous Waste Storage Area-Unauthorized Persons Keep Out", and Spanish, "Cuidado! Zona de Residuos Peligrosos. Prohibida la Entrada a Personas No Autorizadas".
- (d) Each hazardous waste storage area shall have a continuous base that is impervious to the waste to be stored and shall be designed and constructed so that any surface water runoff or spills can be contained.

2. Storage in tanks.

- (a) Each hazardous waste storage tank situated above ground shall have a spill confinement structure (e.g., dike or trough) capable of holding the entire contents of the tank plus sufficient freeboard.
- (b) Hazardous waste storage tanks shall be constructed of materials which are compatible with the wastes to be contained or shall be protected by liners which are compatible with those wastes.
- (c) Prior to use, hazardous waste storage tanks and their appurtenances shall be certified by an engineer registered in California to be structurally sound and of adequate construction for the intended use.
- (d) Each hazardous waste storage tank and storage area shall be individually marked with the internationally recognized hazard

identification system placards developed by the National Fire Prevention Association (NFPA).

- (e) Valves on hazardous waste storage tanks shall be kept locked when the facility is unattended.

3. Storage in containers.

- (a) Containers used for storing hazardous waste shall be in a condition such that the containers can be safely transported, handled or moved.
- (b) Areas used for storing containers of hazardous waste shall be widely separated, or physical barriers shall be provided to ensure that commingling of incompatible hazardous wastes cannot occur if a container on one pad ruptures.
- (c) A label shall be maintained on all containers in which hazardous wastes are stored for 90 days or more and records for the storage of all hazardous wastes shall be maintained pursuant to Section 66545, Title 22 of the California Administrative Code. Labels shall include the following information:
 - (1) Composition and physical state of the waste;
 - (2) Special safety recommendations and precautions for handling the waste;
 - (3) Statement or statements which call attention to the particular hazardous properties of the waste;
 - (4) Amount of waste and name and address of the person producing the waste; and
 - (5) Date of acceptance at the storage facility.
- (d) Empty containers contaminated with hazardous materials shall be stored, handled, processed and disposed of as hazardous wastes.

4. Wastes prohibited.

Hazardous wastes described below shall not be handled at the facility:

- (a) Extremely hazardous wastes as defined in Sections 66064 and 66685, Title 22, California Administrative Code, unless specifically approved by a written permit from the California State Department of Health Services.

- (b) Flammable wastes and water-reactive wastes as defined in Sections 66072 and 66236, respectively, Title 22 of the California Administrative Code.
- (c) Burning wastes.
- (d) Forbidden and Class A explosives as defined in Sections 173.51 and 173.53, Title 49, Code of Federal Regulations.

5. Management of incompatible wastes.

Each of the following categories of incompatible hazardous wastes shall be adequately separated during all handling, storage, and disposal operations:

- (a) Alkalies and cyanides.
- (b) Acids.

6. Public water supply.

If a public water supply is used at the facility, the service connection shall be protected from contamination as specified in Section 7604, Title 17 of the California Administrative Code.

7. Fencing.

The perimeter of the hazardous waste area of the facility shall be secured by a well-maintained fence, capable of preventing the intrusion of livestock and of discouraging entry by unauthorized persons. If the entire facility is appropriately fenced, if the general public does not have access to the hazardous waste area, and if the hazardous waste area is posted with warning signs as described elsewhere in this document, no additional fence shall be required around the hazardous area unless the absence of such a fence could result in a hazard to health, safety, or the environment.

8. Operation at night.

When the facility is operated during hours of darkness, the operator shall provide sufficient lighting to ensure safe, effective management of hazardous wastes.

9. Warning signs.

Signs indicating that the facility, or the hazardous waste area of the facility, contains hazardous waste shall be placed on the perimeter fence at locations where it is anticipated that hunters and other

trespassers may enter the facility such as at trails, major drainages, and ridges. Wording of the signs shall be in English, "Caution-Hazardous Waste Area-Unauthorized Persons Keep Out", and Spanish, "Cuidado! Zona de Residuos Peligrosos. Prohibida la Entrada a Personas No Autorizadas".

10. Telephone or radio communications.

A telephone or radio for summoning aid in the event of an emergency shall be in workable condition and available for immediate use by personnel working in the hazardous waste area of the facility.

11. Safety showers.

The owner or operator shall provide to personnel working in the hazardous waste area of the facility adequate numbers of safety showers. The safety showers shall be in workable condition and available for immediate use.

12. Eyewashes.

The owner or operator shall provide to personnel working in the hazardous waste area of the facility adequate numbers of eyewashes. The eyewashes shall be in workable condition and available for immediate use.

13. First-aid kit.

The owner or operator shall provide to personnel working in the hazardous waste area of the facility adequate numbers of industrial-type first-aid kits. The kits shall be maintained and available for immediate use.

14. Protective clothing.

The owner or operator shall provide to personnel working in the hazardous waste area of the facility adequate numbers of the following National Institute of Occupational Safety and Health (NIOSH) approved equipment if appropriate:

- (a) Protective head gear and face masks.
- (b) Chemically resistant apparel and gloves.
- (c) Self-contained breathing apparatus and respirators with the approved cartridges.

15. Warning alarm system.

If at any time there is a sole employee on the premises, the employee shall have immediate access to an alarm or other communication device capable of summoning external emergency assistance.

III. SAFETY, EQUIPMENT, AND EMERGENCY RESPONSE

1. Identification number.

The facility owner or operator shall have an identification number issued by the U.S. Environmental Protection Agency (EPA).

2. Notices.

- (a) If the owner or operator has arranged to receive hazardous waste from a foreign source, he shall notify the California State Department of Health Services in writing at least four weeks in advance of the date that the waste is expected to arrive at the facility. Notice of subsequent shipments of the same waste from the same foreign source is not required.
- (b) Before transferring ownership or operation of the facility during its operating life or during the post-closure care period, the owner or operator shall notify the new owner or operator in writing of the conditions of this document.

3. Analysis of waste.

- (a)
 - (1) Before the owner or operator treats, stores, or disposes of a particular type of hazardous waste for the first time, he shall obtain a detailed chemical and physical analysis of a representative sample of the waste. At a minimum, this analysis shall contain all the information which must be known to treat, store, or dispose of the waste in accordance with the conditions of this document.
 - (2) The analysis may include data developed for other purposes, and existing published or documented data on the hazardous waste or on waste generated from similar processes.
 - (3) The analysis shall be repeated as necessary to ensure that it is accurate and up-to-date. At a minimum, the analysis must be repeated when the owner or operator is notified, or has reason to believe, that the process or operation generating the hazardous waste has changed.
- (b) Upon the effective date of this document, the owner or operator shall follow a written waste analysis plan which describes the procedures which will be used to comply with Item 3 (a). The plan shall be subject to approval by the California State Department of Health Services and shall be kept at the facility. At a minimum, the plan shall specify:

- (1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters;
- (2) The test methods which will be used to test for these parameters;
- (3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed. A representative sample may be obtained using either:
 - (i) One of the sampling methods described in Appendix I, Part 261, Title 40, Code of Federal Regulations; or
 - (ii) An equivalent sampling method approved by the California State Department of Health Services.
- (4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date;
- (5) Where applicable, the methods which will be used to meet any additional waste analysis requirements for specific waste management methods as specified elsewhere in this document.

4. Security.

- (a) The owner or operator shall prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock onto the active portion of the facility.
- (b) The facility shall have:
 - (1) A 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; or
 - (2)
 - (i) An artificial or natural barrier which completely surrounds the active portion of the facility and which would prevent unauthorized entry; and
 - (ii) A means to control entry, at all times, through the gates or other entrances to the active portion of the facility (e.g., an attendant, television monitors, locked entrance, or controlled roadway access to the facility).

- (c) Upon the effective date of this document, a sign with the legend, "Caution - Hazardous Waste Area - Unauthorized Persons Keep Out," shall be posted at each entrance to the active portion of the facility, and at other locations, in sufficient numbers to be seen from any approach to this active portion. The legend shall be written in English and Spanish, "Cuidado! Zona De Residuos Peligrosos. Prohibida La Entrada A Personas No Autorizadas", and shall be legible from a distance of at least 25 feet. Existing signs with a legend other than "Caution - Hazardous Waste Area - Unauthorized Persons Keep Out" may be used if the legend on the sign indicates that only authorized personnel are allowed to enter the active portion, and that entry onto the active portion can be dangerous.

5. Inspections.

- (a) The owner or operator shall inspect the facility for malfunctions and deterioration, operator errors, and discharges which may be causing--or may lead to--release of hazardous waste constituents to the environment or a threat to human health. The owner or operator shall conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment.
- (b) (1) The owner or operator shall follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards.
- (2) The schedule shall be subject to approval by the California State Department of Health Services.
- (3) He shall keep this schedule at the facility.
- (4) The schedule shall identify the types of problems (e.g., malfunctions or deterioration) which are to be looked for during the inspection (e.g., inoperative sump pump, leaking fitting, eroding dike, etc.).
- (5) The frequency of inspection may vary for the items on the schedule. However, it shall be based on the rate of

possible deterioration of the equipment and the probability of an environmental or human health incident if the deterioration or malfunction or any operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas shall be inspected daily when in use. At a minimum, the inspection schedule shall include the items and frequencies called for elsewhere in this document.

- (c) The owner or operator shall remedy any deterioration or malfunction of equipment or structures which the inspection reveals on a schedule which shall be subject to approval by the California State Department of Health Services and which shall ensure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately.
 - (d) The owner or operator shall record inspections in an inspection log or summary. He shall keep these records for at least three years from the date of inspection. At a minimum, these records shall include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.
6. Personnel training.
- (a)
 - (1) Facility personnel shall successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the conditions of this document. The owner or operator shall ensure that this program includes all the elements described under Item 6 (a)(3).
 - (2) This program shall be directed by a person trained in hazardous waste management procedures, and shall include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.
 - (3) At a minimum, the training program shall be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable:
 - (i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
 - (ii) Key parameters for automatic waste feed cut-off systems;

- (iii) Communications or alarm systems;
 - (iv) Response to fires or explosions;
 - (v) Response to ground-water contamination incidents;
and
 - (vi) Shutdown of operations.
- (b) Facility personnel shall have successfully completed the program required in Item 6 (a) by the effective date of this document or within six months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later. Employees hired after the effective date of this document shall not work in unsupervised positions until they have completed the training requirements of Item 6 (a).
- (c) Facility personnel shall take part in an annual review of the initial training required in Item 6 (a).
- (d) The owner or operator shall maintain the following documents and records at the facility:
- (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
 - (2) A written job description for each position listed under Item 6 (d)(1). This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but shall include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;
 - (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under Item 6 (d) (1); and
 - (4) Records that document that the training or job experience required under Items 6 (a), (b), and (c) has been given to, and completed by, facility personnel.
- (e) Training records on current personnel as required in Item 6 (d) 4 shall be kept until closure of the facility. Training records on former employees shall be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

7. Ignitable, reactive, or incompatible wastes.

- (a) The owner or operator shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste shall be separated and protected from sources of ignition or reaction. While ignitable or reactive waste is being handled, the owner or operator shall confine smoking and open flame to specially designated locations. "No Smoking" signs shall be conspicuously placed wherever there is a hazard from ignitable or reactive waste.
- (b) The treatment, storage, or disposal of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials shall be conducted so that it does not:
 - (1) Generate extreme heat or pressure, fire or explosion, or violent reaction;
 - (2) Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health;
 - (3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;
 - (4) Damage the structural integrity of the device or facility containing the waste; or
 - (5) Through other like means threaten human health or the environment.

8. Maintenance and operation of facility.

The facility shall be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

9. Testing and maintenance of equipment.

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, shall be tested and maintained as necessary to ensure its proper operation in time of emergency.

10. Required aisle space.

The owner or operator shall maintain aisle space as needed to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

11. Arrangements with local authorities.

(a) Upon the effective date of this document, the owner or operator shall attempt to make the following arrangements, as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations:

- (1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;
- (2) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;
- (3) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and
- (4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

(b) Where State or local authorities decline to enter into such arrangements, the owner or operator shall document the refusal in the operating record.

12. Purpose and implementation of contingency plan.

(a) Upon the effective date of this document, the owner or operator shall have a contingency plan for the facility. The contingency plan shall be subject to approval by the California State Department of Health Services and shall be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

- (b) The provisions of the plan shall be carried out immediately wherever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

13. Content of contingency plan.

- (a) The contingency plan shall describe the actions facility personnel shall take to comply with Items 12 and 17 in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.
- (b) If the owner or operator has already prepared some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the conditions of this document.
- (c) The plan shall describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to Item 13.
- (d) The plan shall list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see Item 18), and this list shall be kept up to date. Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates.
- (e) The plan shall include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list shall be kept up to date. In addition, the plan shall include the location and a physical description of each item on the list, and a brief outline of its capabilities.
- (f) The plan shall include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan shall describe signal(s) to be used to begin evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous wastes or fires).

14. Copies of contingency plan.

A copy of the contingency plan and all revisions to the plan shall be:

(a) Maintained at the facility; and

(b) Submitted to the California State Department of Health Services and to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

15. Amendment of contingency plan.

The contingency plan shall be reviewed, and immediately amended, if necessary, whenever:

(a) Applicable regulations are revised;

(b) The plan fails in an emergency;

(c) The list of emergency coordinators changes; or

(d) The list of emergency equipment changes.

16. Emergency coordinator.

At all times, there shall be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator shall be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, this person shall have the authority to commit the resources needed to carry out the contingency plan.

17. Emergency procedures.

(a) Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) shall:

(1) Immediately activate internal facility alarms or communication systems, where applicable, to notify all facility personnel;

(2) Immediately notify appropriate State or local agencies with designated response roles if their help is needed; and

(3) Notify the California State Department of Health Services by telephone or telegraph within 24 hours of occurrence.

- (b) Whenever there is a release, fire, or explosion, the emergency coordinator shall immediately identify the character, exact source, amount, and areal extent of any released materials. This may be done by observation or review of facility records or manifests and, if necessary, by chemical analysis.
- (c) Concurrently, the emergency coordinator shall assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment shall consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).
- (d) If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, the findings shall be reported as follows:
 - (1) The emergency coordinator shall immediately notify either the government official designated as the on-scene coordinator for that geographical area (in the applicable regional contingency plan under Part 1510, Title 40, Code of Federal Regulations), or the National Response Center (using their 24-hour toll free number: 800/424-8802). The report shall include:
 - (i) Name and telephone number of reporter;
 - (ii) Name and address of facility;
 - (iii) Time and type of incident (e.g., release, fire);
 - (iv) Name and quantity of material(s) involved, to the extent known;
 - (v) The extent of injuries, if any; and
 - (vi) The possible hazards to human health, or the environment, outside the facility.
 - (2) If his assessment indicates that evacuation of local areas may be advisable, appropriate local authorities shall be notified immediately. The emergency coordinator shall be available to help appropriate officials decide whether local areas should be evacuated.
- (e) During an emergency the emergency coordinator shall take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous

waste at the facility. These measures shall include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

- (f) If the facility stops operations in response to a fire, explosion or release, the emergency coordinator shall monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.
- (g) Immediately after an emergency, the emergency coordinator shall provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.
- (h) The emergency coordinator shall ensure that, in the affected area(s) of the facility:
 - (1) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
 - (2) All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.
- (i) The owner or operator shall notify the California State Department of Health Services and local authorities, that the facility is in compliance with Item 17 (h) before operations are resumed in the affected area(s) of the facility.
- (j) The owner or operator shall note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 30 days after the incident, he shall submit a written report on the incident to the California State Department of Health Services. The report shall include:
 - (1) Name, address, and telephone number of the owner or operator;
 - (2) Name, address, and telephone number of the facility;
 - (3) Date, time, and type of incident (e.g., fire, explosion);
 - (4) Name and quantity of material(s) involved;
 - (5) The extent of injuries, if any;

- (6) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- (7) Estimated quantity and disposition of recovered material that resulted from the incident.

IV. RECORDKEEPING

1. Operating record.

- (a) The owner or operator shall keep a written operating record at the facility.**
- (b) The following information shall be recorded, as it becomes available, and maintained in the operating record until closure of the facility:**
 - (1) A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility;**
 - (2) The location of each hazardous waste within the facility and the quantity at each location. This information shall include cross-references to specific manifest document numbers, if the waste was accompanied by a manifest;**
 - (3) Records and results of waste analyses and trial tests performed;**
 - (4) Summary reports and details of all incidents that require implementing the contingency plan;**
 - (5) Records and results of inspections (except these data need be kept only three years);**
 - (6) Monitoring, testing or analytical data where required; and**
 - (7) All closure cost estimates.**

2. Availability, retention, and disposition of records.

- (a) All records including plans, required in this document shall be furnished upon request, and made available at all reasonable times for inspection, by any officer, employee, or representative of the California State Department of Health Services who is duly designated by the Director;**
- (b) The retention period for all records required in this document is extended automatically during the course of any unresolved enforcement action regarding the facility or as requested by the California State Department of Health Services;**

- (c) A copy of records of waste disposal locations and quantities in Item 1 (b)(2) shall be submitted to the California State Department of Health Services and local land authority upon closure of the facility.

3. Annual report.

The owner or operator shall prepare and submit a single copy of an annual report to the California State Department of Health Services by March 1 of each year beginning March 1, 1982. The annual report shall cover facility activities during the previous calendar year and shall include the following information:

- (a) The EPA identification number, name, and address of the facility;
- (b) The calendar year covered by the report;
- (c) A description and the quantity of each hazardous waste the facility received during the year;
- (d) The method of treatment, storage, or disposal for each hazardous waste;
- (e) Monitoring data where required;
- (f) The most recent closure cost estimate;
- (g) The certification signed by the owner or operator of the facility or his authorized representative.

4. Additional reports.

In addition to submitting the annual report required in Item 3, the owner or operator shall also report to the California State Department of Health Services:

- (a) Releases, fires, and explosions;
- (b) Ground-water contamination and monitoring data;
- (c) Facility closure.

V. CLOSURE

1. Closure.

The owner or operator shall close his facility in a manner that: (a) minimizes the need for further maintenance, and (b) controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground water, or surface waters, or to the atmosphere.

2. Closure plan and amendment of plan.

- (a) The owner or operator shall have a written closure plan. This plan shall be subject to approval by the California Regional Water Quality Control Board and shall be kept at the facility. This plan shall identify the steps necessary to close the facility completely at any point during its intended life and at the end of its intended life. The closure plan shall include, at least:
- (1) A description of how and when the facility will be partially closed, if applicable, and ultimately closed. The description shall identify the maximum extent of the operation which will be unclosed during the life of the facility, and how Item 1 and other applicable conditions of this document will be met;
 - (2) An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility;
 - (3) A description of the steps needed to decontaminate facility equipment during closure; and
 - (4) A schedule for final closure which shall include, as a minimum, the anticipated date when wastes will no longer be received, the date when completion of final closure is anticipated, and intervening milestone dates which will allow tracking of the progress of closure. (For example, the expected date for completing treatment or disposal of waste inventory shall be included, as must the planned date for removing any residual wastes from storage facilities and treatment processes.)

- (b) The owner or operator may amend his closure plan at any time during the active life of the facility. (The active life of the facility is that period during which wastes are periodically received.) The owner or operator shall amend his plan any time changes in operating plans or facility design affect the closure plan.
- (c) The owner or operator shall submit his closure plan to the California Regional Water Quality Control Board at least 180 days before the date he expects to begin closure. The California Regional Water Quality Control Board will modify, approve, or disapprove the plan within 90 days of receipt and after providing the owner or operator and the affected public (through a newspaper notice) the opportunity to submit written comments.

3. Time allowed for closure.

- (a) Within 90 days after receiving the final volume of hazardous wastes, the owner or operator shall treat all hazardous wastes in storage or in treatment, or remove them from the site, or dispose of them on-site, in accordance with the approved closure plan.
- (b) The owner or operator shall complete closure activities in accordance with the approved closure plan and within six months after receiving the final volume of wastes. The California Regional Water Quality Control Board may approve a longer closure period under Item 2 (c) if the owner or operator can demonstrate that: (1) the required or planned closure activities will, of necessity, take him longer than six months to complete, and (2) that he has taken all steps to eliminate any significant threat to human health and the environment from the unclosed but inactive facility.

4. Disposal or decontamination of equipment.

When closure is completed, all facility equipment and structures shall have been properly disposed of, or decontaminated by removing all hazardous waste and residues.

5. Certification of closure.

When closure is completed, the owner or operator shall submit to the California Regional Water Quality Control Board certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

VI. FINANCIAL RESPONSIBILITY

1. Cost estimate for facility closure.

- (a) The owner or operator shall have a written estimate of the cost of closing the facility in accordance with the applicable closure requirements of this document. The owner or operator shall keep this estimate, and all subsequent estimates, at the facility. The estimate shall equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan.
- (b) The owner or operator shall prepare a new closure cost estimate whenever a change in the closure plan affects the cost of closure.
- (c) On each anniversary of the effective date of this document, the owner or operator shall adjust the latest closure cost estimate using an inflation factor derived from the annual Implicit Price Deflator for Gross National Product as published by the U.S. Department of Commerce in its *Survey of Current Business*. The inflation factor shall be calculated by dividing the latest published annual Deflator by the Deflator for the previous year. The result is the inflation factor. The adjusted closure cost estimate shall equal the latest closure cost estimate (see Item 1(b)) times the inflation factor.

VII. TANKS

1. Operation.

- (a) Treatment or storage of hazardous waste in tanks shall comply with Item 7 (b), Part III of this document.
- (b) Hazardous waste or treatment reagents shall not be placed in a tank if they could cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail before the end of its intended life.
- (c) Uncovered tanks shall be operated to ensure at least 60 centimeters (2 feet) of freeboard, or the tank shall be equipped with a containment structure (e.g., dike or trench), a drainage control system, or a diversion structure (e.g., standby tank) with a capacity that equals or exceeds the volume of the top 60 centimeters (2 feet) of the tank.
- (d) If hazardous waste is continuously fed into a tank, the tank shall be equipped with a means to stop this inflow (e.g., a waste feed-cutoff system or by-pass system to a stand-by tank).

2. Analysis of waste and trial tests.

- (a) If a tank is to be used for:
 - (1) Chemically treating or storing a hazardous waste which is substantially different from waste previously treated or stored in that tank; or
 - (2) Chemically treating hazardous waste with a substantially different process than any previously used in that tank; the owner or operator shall before treating or storing the different waste or using the different process:
 - (i) Conduct waste analyses and trial treatment or storage tests (e.g., bench scale or pilot plant scale tests) to document that this proposed treatment or storage will comply with Items 1(a) and (b); or
 - (ii) Obtain written information on similar storage or treatment of similar waste under similar operating conditions to document that this proposed treatment or storage will comply with Items 1 (a) and (b).

3. Inspections.

- (a) The owner or operator of a tank must inspect, if applicable:
 - (1) Discharge control equipment (e.g., waste feed cut-off systems, and drainage systems), at least once each operating day, to ensure that it is in good working order;
 - (2) Data gathered from monitoring equipment (e.g., pressure and temperature gauges), at least once each operating day, to ensure that the tank is being operated according to its design;
 - (3) The level of waste in the tank, at least once each operating day, to ensure compliance with Item 1 (c);
 - (4) The construction materials of the tank, at least weekly, to detect corrosion or leaking of fixtures or seams; and
 - (5) The construction materials of, and the area immediately surrounding, discharge confinement structures (e.g., dikes), at least weekly, to detect erosion or obvious signs of leakage (e.g., wet spots or dead vegetation).

4. Closure.

At closure, all hazardous waste and hazardous waste residues shall be removed from tanks, discharge control equipment, and discharge confinement structures.

5. Ignitable or reactive waste.

- (a) Ignitable or reactive waste shall not be placed in a tank, unless:
 - (1) The waste is treated, rendered, or mixed before or immediately after placement in the tank so that the resulting waste, mixture, or dissolution of material is no longer ignitable or reactive and Item 7 (b), Part III of this document is complied with; or
 - (2) The waste is stored or treated in such a way that it is protected from any material or conditions which may cause the waste to ignite or react; or
 - (3) The tank is used solely for emergencies.
- (b) If the owner or operator treats or stores ignitable or reactive waste in covered tanks, he shall comply with the National Fire Protection Association's (NFPA's) buffer zone requirements for tanks, contained in Tables 2-1 through 2-6 of the "Flammable and Combustible Code--1977".

6. Incompatible Wastes.

- ..(a) Incompatible wastes, or incompatible wastes and materials, shall not be placed in the same tank, unless Item 7 (b), Part III of this document is complied with.
- (b) Hazardous waste shall not be placed in an unwashed tank which previously held an incompatible waste or material.

VIII. STORAGE OF CONTAINERS

1. Condition.

If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator shall transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the conditions of this document.

2. Compatibility of waste.

The owner or operator shall use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

3. Management.

- (a) A container holding hazardous waste shall remain closed during storage, except when it is necessary to add or remove waste.
- (b) A container holding hazardous waste shall not be opened, handled, or stored in a manner which might rupture the container or cause it to leak.

4. Inspections.

The owner or operator shall inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

5. Ignitable or reactive waste.

Containers holding ignitable or reactive waste shall be situated at least 15 meters (50 feet) from the property line of the facility.

6. Incompatible wastes.

- (a) Incompatible wastes, or incompatible wastes and materials, shall not be placed in the same container, unless the requirements of Item 7 (b), Part III of this document are met.
- (b) Hazardous waste shall not be placed in an unwashed container that previously held an incompatible waste or material unless the requirements of Item 7 (b), Part III of this document are met.

- (c) A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments shall be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.

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DEPARTMENT OF HEALTH SERVICES

714/744 P STREET
P.O. BOX 942732
SACRAMENTO, CA 94234-7320
(916) 324-2423



APR 14 1990

Ms. Sharon Bradley
The Marquardt Company
16555 Saticoy Street
Van Nuys, California 91409

CERTIFIED MAIL

Dear Ms. Bradley:

REPORT OF VIOLATION
EPA ID #CAD044696102

On October 11, 1990, the Department of Health Services completed a review of the financial responsibility file for the above-named facility.

As a result of this review, we have determined that the facility is not in compliance with the following state regulations:

- o Title 22, California Code of Regulations (CCR), Section 67027 by failing to provide liability coverage for sudden accidental occurrences; and
- o Title 22, CCR, Section 67003 by failing to provide evidence of financial assurance for closure costs.

Please submit the following immediately:

1. A certificate of insurance, financial test, letter of credit, surety bond, trust fund, or alternative mechanism to demonstrate liability coverage (\$1 million per occurrence per facility with a \$2 million annual aggregate per facility for sudden accidental occurrences).
2. Financial documents in the form of a trust fund, surety bond, letter of credit, closure insurance, a financial test/corporate guarantee, or alternative mechanism for closure costs.

NOTE: The required wording and forms are enclosed.

The issuance of this Report of Violation does not preclude the Department from taking administrative, civil, or criminal action related to the violations noted herein.

Ms. Sharon Bradley
Page 2

If you have any questions regarding this Report of Violation, please contact Richard Castle at (916) 324-2431.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul D. Blais".

Paul D. Blais, Chief
Hazardous Waste Management Branch
Toxic Substances Control Program

Enclosures

cc: Gautam Guha
Facility Management Branch
Region 3

Arnold Robbins
EPA - Region IX

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DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM (REGION 3)
1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504
(818) 567-3000



November 21, 1990

E. D. Menard
The Marquardt Corporation
16555 Saticoy Street
Van Nuys, CA 91409

Dear Mr. Menard:

REQUEST FOR AN EXTENSION OF THE DUE DATE FOR MARQUARDT'S OPERATION PLAN.
CAD 044696102

In your letter of November 12, 1990 you requested an extension of the due date for the submittal of Marquardt's Operation Plan.

The due date is hereby extended to December 31, 1990. If the Operation Plan is not received by that date, the Department will assume that Marquardt has chosen to withdraw its application to treat and/or store hazardous waste.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis A. Dickerson", is written over a horizontal line.

Dennis A. Dickerson
Regional Administrator

Certified Mail
847018
Return Receipt Requested

cc: Paul Blais, Chief
Hazardous Waste Management Branch
Department of Health Services
Toxic Substances Control Program
714/744 P Street
P.O. Box 942732
Sacramento, CA 94234-7320

E. D. Menard
November 21, 1990
Page 2

cc: Michael Feely
State Program Branch
U. S. Environmental Protection Agency
1235 Mission Street
San Francisco, CA 94103

Tom Kelly
U.S. Environmental Protection Agency
1235 Mission Street
San Francisco, CA 94103

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DEPARTMENT OF HEALTH SERVICES

TOXIC SUBSTANCES CONTROL PROGRAM
REGION 3

1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504



September 21, 1990

E. D. Menard
The Marquardt Corporation
16555 Saticoy Street
Van Nuys, CA 91409

Dear Mr. Menard:

REQUEST FOR AN EXTENSION OF THE DUE DATE FOR MARQUARDT'S OPERATION PLAN.
CAD 044696102

In your letter of September 12, 1990 you requested an extension of the due date for the submittal of Marquardt's Operation Plan.

The due date is hereby extended to November 15, 1990. If the Operation Plan is not received by that date, the Department will assume that Marquardt has chosen to withdraw its application to treat and/or store hazardous waste.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis A. Dickerson", is located below the "Sincerely," text.

Dennis A. Dickerson
Regional Administrator

Certified Mail

847018

Return Receipt Requested

cc: Paul Blais, Chief
Hazardous Waste Management Branch
Department of Health Services
Toxic Substances Control Program
714/744 P Street
P.O. Box 942732
Sacramento, CA 94234-7320

Mr. E. D. Menard
Page 2
September 21, 1990

cc: Michael Feely
State Program Branch
U. S. Environmental Protection Agency
1235 Mission Street
San Francisco, CA 94103

Tom Kelly
U.S. Environmental Protection Agency
1235 Mission Street
San Francisco, CA 94103

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DEPARTMENT OF HEALTH SERVICES

714/744 P STREET
P.O. BOX 942732
SACRAMENTO, CA 94234-7320
(916) 324-3752



DEC 13 1989

Dean Menard
The Marquard Company
16555 Saticoy Street
Van Nuys, California 91409

CERTIFIED MAIL

Dear Mr. Menard:

SECOND REPORT OF VIOLATION
EPA ID #CAD044696102

On October 5, 1989, the Department of Health Services completed a review of the financial responsibility file for the above-named facility located at 16555 Saticoy Street in Van Nuys, California.

As a result of this review, we have determined that the facility is not in compliance with the following state regulations:

- o Title 22, California Code of Regulations (CCR), section 67027 by failing to provide liability coverage for sudden accidental occurrences (\$1 millions per occurrence per facility with a \$2 million annual aggregate per facility); and
- o Title 22, CCR, section 67003 by failing to provide evidence of financial assurance for closure costs.

Title 22, CCR, Section 67003 requires that an updated financial test be submitted to the Department within ninety (90) days after the close of each succeeding fiscal year. The financial test for the fiscal year ending March 31, 1989 must be submitted immediately. It was due June 30, 1989.


NOTE: The required wording and forms are enclosed.

The issuance of this Report of Violation does not preclude the Department from taking administrative, civil, or criminal action related to the violations noted herein.

Dean Menard
Page 2

If you have any questions regarding this Report of Violation,
please contact Nancy Jestreby at (916) 324-1804.

Sincerely,


Lucille van Ommering, Chief
Financial Responsibility Unit
Toxic Substances Control Program

Enclosures

cc: John Hinton
Facility Permit Unit
Region 3

Jerry Lile
Surveillance and Enforcement Unit
Region 3

Arnold Robbins
EPA - Region IX

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DEPARTMENT OF HEALTH SERVICES

714/744 P STREET
P.O. BOX 942732
SACRAMENTO, CA 94234-7320
(916) 324-3752



OCT 17 1989

Dean Menard
The Marquard Company
16555 Saticoy Street
Van Nuys, California 91409

CERTIFIED MAIL

Dear Mr. Menard:

REPORT OF VIOLATION
EPA ID #CAD044696102

On October 5, 1989, the Department of Health Services completed a review of the financial responsibility file for the above-named facility located at 16555 Saticoy Street in Van Nuys, California.

As a result of this review, we have determined that the facility is not in compliance with the following state regulations:

- o Title 22, California Code of Regulations (CCR), section 67027 by failing to provide liability coverage for sudden accidental occurrences (\$1 million per occurrence per facility with a \$2 million annual aggregate per facility); and
- o Title 22, CCR, section 67003 by failing to provide evidence of financial assurance for closure costs.

Title 22, CCR, Section 67030 requires that an updated financial test be submitted to the Department within ninety (90) days after the close of each succeeding fiscal year. The financial test for the fiscal year ending March 31, 1989 must be submitted immediately. It was due June 30, 1989.

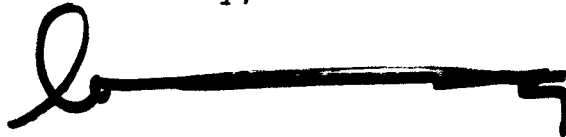
NOTE: The required wording and forms are enclosed.

The issuance of this Report of Violation does not preclude the Department from taking administrative, civil, or criminal action related to the violations noted herein.

Dean Menard
Page 2

If you have any questions regarding this Report of Violation,
please contact Nancy Jestreby at (916) 324-1804.

Sincerely,

A handwritten signature in black ink, appearing to be 'Lucille van Ommering', written over a horizontal line.

Lucille van Ommering, Chief
Financial Responsibility Unit
Toxic Substances Control Program

Enclosures

cc: John Hinton
Facility Permit Unit
Region 3

Jerry Lile
Surveillance and Enforcement Unit
Region 3

Arnold Robbins
EPA - Region IX

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DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY, ROOM 7011
LOS ANGELES, CA 90012
(213) 620-2380



JAN 13 1989

Ms. Sharon Bradley
The Marquardt Company
16555 Saticoy Street
Van Nuys, CA 91409-9104

Dear Ms. Bradley:

HAZARDOUS WASTE FACILITY PART B PERMIT APPLICATION, EPA ID NO. CAD 044696102

We received on 12/1/88 your Part B application (Operation Plan) for a hazardous waste facility permit for your facility located at 16555 Saticoy Street, Van Nuys, CA. There is a backlog of such applications and a final determination may be delayed.

Until we make a final determination on the permit application, your facility shall continue to operate in accordance with the requirements of your existing interim status document.

If you have questions concerning your application, don't hesitate to contact us at the letterhead address.

Sincerely,

A handwritten signature in cursive script, appearing to read "John A. Hinton", is written over the typed name.

John A. Hinton, P.E., Chief
Facility Permitting Unit
Region 3 (Los Angeles)
Toxic Substances Control Division

JAH:JK:ms

cc: Ralph Lopez
Environmental Management Deputy
County of Los Angeles
313 N. Figueroa Avenue
Los Angeles, CA 90012

Ms. Sharon Bradley

Page 2

JAN 11 1984

cc: James C. Breitlow
U.S. EPA Region IX
215 Fremont Street
San Francisco, CA 94105

Caroline Cabias
Hazardous Waste Management Section
Toxic Substances Control Division
714/744 "P" Street
P.O. Box 942732
Sacramento, CA 94234

Hank Yacoub
California Regional Water
Quality Control Board
107 S. Broadway, Rm. 4027
Los Angeles, CA 90012

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INFORMATION REGARDING POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: ISC-MARQUARDT COMPANY

EPA I. D. NUMBER: CAD 044696102

LOCATION City 16555 Saticoy Street, Van Nuys

State CA 91409

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A OR B APPLICATION

	<u>Yes</u>	<u>No</u>
• Landfill	—	<u>X</u>
• Surface Impoundment	—	<u>X</u>
• Land Farm	—	<u>X</u>
• Incinerator	—	<u>X</u>
• Storage Tank (Above Ground)	—	<u>X</u>
• Storage Tank (Underground)	—	<u>X</u>
• Container Storage Area	—	<u>X</u>
• Injection Wells	—	<u>X</u>
• Wastewater Treatment Units	—	<u>X</u>
• Transfer Stations	—	<u>X</u>
• Waste Recycling Operations	—	<u>X</u>
• Other Waste Handling Areas Not Covered Above	—	<u>X</u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous waste or hazardous constituents under RCRA. Also, include any available data on quantities or volumes of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

NOTE: Hazardous wastes are those identified in 40 CFR Part 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A or B application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information:

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

a. Sometime prior to March 1988

b. Petroleum Hydrocarbon

c. Approximately 60 Gal.

d. Overflow waste oil tank (Now Removed)

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

Included are soil sample analytical results before and after cleanup. Soil is now clean to background levels (A)

5. Describe the approximate dates and locations of product spills and releases which have occurred or are recurring at your facility and any cleanup operations which have occurred relative to these incidents.

a. 2/18/86

b. Chromic Acid (10% Gal.)

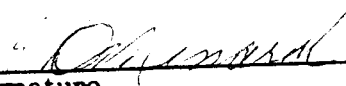
c. 500 - 1,000 Gal.

- d. The wrong valve was opened - solution went to sewer. This valve has been removed. Solution can now only flow to the treatment tank. (B)

Signature and Certification

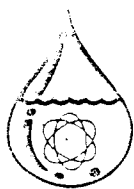
As with reports in RCRA Permit Applications, submittal of this information must contain the following certification and signature by a principal executive officer, of at least the level of Vice President or by a duly authorized representative of that person:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments, and that based on my inquiry of those individuals immediately responsible for obtaining the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.


Signature

E. D. Menard - Secretary
Name and Title (Typed)

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CHEM PRO LABORATORY, INC.
CHEMICAL ENGINEERS
941 WEST 190th STREET, GARDENA, CALIFORNIA 90243-4398

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CLIENT The Marquardt Company
16555 Saticoy Street
Van Nuys, CA 91409

Sharon Bradley

LABORATORY NO. 5356

REPORTED 08-04-1988

SAMPLED 07-14-1988

RECEIVED 07-15-1988

SAMPLE Soil Sample TMC/Background

MARKS Hazardous Waste Analyses


BASED ON SAMPLE as received

Results in mg/kg unless otherwise noted.

<u>CONSTITUENTS</u>	<u>RESULTS</u>	<u>METHOD</u>	<u>DETECTION LIMITS</u>
Chromium, Total	23	EPA6010	5
Cyanide, Total	<0.2	SM412B&D	0.2
Lead, Total	31	SM316A	5
*Total Petroleum Hydrocarbons	70	EPA418	10

Respectfully Submitted,

CHEM PRO LABORATORY, INC.


Richard F. Pelly,
Chemist

RFP/mw
SP100

Note: * per Associated Laboratories - State Certified

Unless notified in writing, all samples for Sanitation Districts tests will be returned to customer. All other samples will be discarded by appropriate disposal protocol 30 days from date reported.



Curtis & Tompkins, Ltd., Analytical Laboratories, Since 1878

- Gooch Laboratories Division -

1250 S. Boyle Ave., Los Angeles, CA 90023, Ph. (213) 269-7421

LABORATORY NO. 23104

REPORTED 7/29/88

RECEIVED 7/26/88

FOR The Marquardt Company

REPORT ON One Soil Sample

MARK P.O. No. 860265

- 1) Waste Oil Pit - EPA 8240, EPA 418.1,
Area 1,2 Title 22 Metals
7-26-88

See attached for results.


Laboratory Director

LABORATORY NO.: 23104-1 RECEIVED: 7/26/88
 CLIENT: The Marquardt Company ANALYZED: 7/26/88
 CLIENT ID: Waste Oil Pit - Area 1,2 REPORTED: 7/29/88

EPA METHOD 8240 (EXPANDED): VOLATILE ORGANICS IN SOIL AND WASTE

COMPOUND	RESULT ug/Kg	DETECTION LIMIT ug/Kg
Benzene	ND	500
Carbon tetrachloride	ND	500
Chlorobenzene	ND	500
1,2-Dichloroethane	ND	500
1,1,1-Trichloroethane	ND	500
1,1-Dichloroethane	ND	500
1,1,2-Trichloroethane	ND	500
1,1,2,2-Tetrachloroethane	ND	500
Chloroethane	ND	500
2-Chloroethylvinyl ether	ND	1000
Chloroform	ND	500
1,1-Dichloroethene	ND	500
1,2-Dichloroethene (Total)	ND	500
1,2-Dichloropropane	ND	500
1,3-Dichloropropene	ND	500
Ethylbenzene	ND	500
Methylene chloride	ND	1000
Chloromethane	ND	500
Bromomethane	ND	500
Bromoform	ND	500
Bromodichloromethane	ND	500
Fluorotrichloromethane	ND	500
Chlorodibromomethane	ND	500
Tetrachloroethene	ND	500
Toluene	ND	500
Trichloroethene	ND	500
Vinyl chloride	ND	500

NON-PRIORITY HAZARDOUS POLLUTANT SUBSTANCES LIST COMPOUNDS

Acetone	ND	1000
2-Butanone	ND	1000
Carbon disulfide	ND	500
2-Hexanone	ND	500
4-Methyl-2-pentanone	ND	500
Styrene	ND	500
Vinyl acetate	ND	500
Total xylenes	ND	500

QA/QC SUMMARY: SURROGATE SPIKE RECOVERY
 1,2 Dichloroethane-d4: 98 %
 Toluene-d8: 96 %
 Bromofluorobenzene: 101 %

ND = Not Detected.

LABORATORY NO.: 23104 RECEIVED: 7/26/88
 CLIENT: The Marquardt Company ANALYZED: 7/27/88
 CLIENT ID: See Below. REPORTED: 7/29/88

METHOD REFERENCE: TOTAL PETROLEUM HYDROCARBONS, TPH - EPA 418.1

C & T ID	CLIENT ID	TPH mg/Kg
1	Waste Oil Pit Area 1,2	11,400

QA/QC SUMMARY: DUPLICATE - RELATIVE
 % DIFFERENCE 3
 SPIKE - % RECOVERY 107

LABORATORY NO.: 23104-1 RECEIVED: 7/26/88
CLIENT: The Marquardt Company ANALYZED: 7/28/88
CLIENT ID: Waste Oil Pit - Area 1,2 REPORTED: 7/29/88

CALIFORNIA ADMINISTRATIVE CODE - TITLE 22: 17 METALS, TTLC LIMITS

DIGESTION METHOD: EPA 3050

ELEMENT	RESULT mg/Kg	TTLC LIMIT mg/Kg	ANALYSIS METHOD
Antimony	<20.0	500	EPA 6010
Arsenic	0.2	500	EPA 7061 Modified
Barium	53.8	10,000	EPA 6010
Beryllium	9.8	75	EPA 6010
Cadmium	<2.0	100	EPA 6010
Chromium	6.4	2,500	EPA 6010
Cobalt	11.0	8,000	EPA 6010
Copper	7.2	2,500	EPA 6010
Lead	57.2	1,000	EPA 6010
Mercury	<0.04	20	EPA 7470 Modified
Molybdenum	13.0	3,500	EPA 6010
Nickel	4.4	2,000	EPA 6010
Selenium	<0.1	100	EPA 7741 Modified
Silver	<2.0	500	EPA 6010
Thallium	<20.0	700	EPA 6010
Vanadium	18.4	2,400	EPA 6010
Zinc	24.0	5,000	EPA 6010

QA/QC SUMMARY

SPIKE - % RECOVERY		SPIKE - % RECOVERY	
Antimony	73	Mercury	92
Arsenic	98	Molybdenum	79
Barium	86	Nickel	72
Beryllium	92	Selenium	66
Cadmium	92	Silver	78
Chromium	89	Thallium	78
Cobalt	96	Vanadium	89
Copper	82	Zinc	68
Lead	82		



Curtis & Tompkins, Ltd., Analytical Laboratories, Since 1878

- Gooch Laboratories Division -

1250 S. Boyle Ave., Los Angeles, CA 90023, Ph. (213) 269-7421

LABORATORY NO. 23128

REPORTED 8/2/88
RECEIVED 7/29/88

FOR The Marquardt Company

REPORT ON One Soil Sample

MARK P.O. No. 860265

- 1) Bldg. Site 115/116, - EPA 418.1, Lead
Area 1/2,
7-29-88

See attached for results.



Laboratory Director

LABORATORY NO.:	23128-1	RECEIVED:	7/29/88
CLIENT:	The Marquardt Company	ANALYZED:	8/1/88
CLIENT ID:	P.O. No. 860265	REPORTED:	8/2/88

ANALYSIS	RESULT (mg/Kg)	METHOD
=====	=====	=====
Lead	54.0	EPA 3050/6010
Total Petroleum Hydrocarbons	<5.0	EPA 418.1

QA/QC SUMMARY	DUPLICATE - RELATIVE % DIFFERENCE	SPIKE - % RECOVERY
=====	=====	=====
Lead	-	70
Total Petroleum Hydrocarbons	11	111

BUREAU OF SANITATION
Research & Planning Division
2335 Dorrie Place
Los Angeles, CA 90031

February 18, 1986

Subject: Notice of Violation #42745

At approximately 8:00 A.M. on Tuesday, Feb. 18, a 500 - 1000 gallon accidental discharge took place from our Bldg - 101 chemical process area. The spilled material was Micel 312, a deoxidizer for aluminum parts that contains 1 ounce per gallon chromic acid. The spill traveled from the NorthWest corner of the facility to the SouthEast corner to our main discharge point at Hayvenhurst (see Drawing #1). Samples were removed there and analyzed by Atomic Absorption, ~~Results~~ indicated' ... 4 to 14 ppm Chromium.

The incident occurred due to two errors in the actions of employees. First of all, on Monday, Feb 17, the 1000 gallon tank containing Micel 312 was dumped ^{into} the sump below so that the sump pump could pump it directly into the treatment tanks on Tuesday morning. The procedure is to always pump the waste material into 55 gallon drums, at which time it is easily handled at an appropriate time. Since the material was in the sump, and no portable pump with enough lift was available to pump it into barrels, the Micel 312 was to be pumped directly to the Treatment Tank #2. It was ~~to~~ to be treated with Sodium sulfite to reduce to Chrome +3 state. Strict instructions were made to have all water and the automatic pump to be shut off until proper cleaning of the sump had been completed.

At approximately 8:00 A.M., the sump pump was activated so that the Micel 312 in the sump would be transported directly to Treatment Tank #2. During the pumping process, it was discovered that a valve (that went directly to sewer) was also open thereby sending the chrome directly down the sewer instead of to the tank. This error was discovered too late. The chrome material traveled through the facility, and exited at our Hayvenhurst main discharge.

This accident took place as a result of human error, and actions are being taken to ensure this doesn't happen again. In addressing these, I should point out that the tank was being drained to remove the chrome deoxidizer with a new Non-Chrome deoxidizer. The past 6 months have been spent researching, testing, analyzing, and writing new procedures for the replacement non-chrome deoxidizer - - - Oakite Deoxidizer LNC. Our intention was to reduce our chrome discharge in every process area possible, so as to easily comply with New EPA Pretreatment Standards for Combined Wastestream Formula applications. Consequently, now that the chrome (Micel 312) will no longer be used, further accidental discharges will be impossible.

In addition to this, the valve left open accidentally left open will be permanently removed. There is no purpose to keeping this valve in place, and it causes confusion to new and untrained employees.

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PART A RATING SHEET

FACILITY NAME: The Marquardt Co.EPA I.D. #: CAD044696102 COUNTY: 037 SCORE: 028PROCESS: 502 501

SCORE = POINTS X WEIGHTING FACTOR 0 = Non Hazardous 99 = Imminent Hazard	WEIGHTING FACTOR	SCORE
AGE OF FACILITY (YEARS) 0 - 10 11 - 20 21 - 30 over 30 1 pt. 2 pt. 3 pt. 4 pt.	1	1
PROCESS DESIGN CAPACITY (GAL.) 1 - 1k 1k - 10k 10k - 100k 100k - 500k over 500k 1 pt. 2 pt. 3 pt. 4 pt. 5 pt.	2	6
PROCESS (pick worst case, add 1 point if any additional processes, then multiply by weighing factor) 5 pt. - landfill (D80) disposal in surface impoundments (D83) injection wells (D79) 4 pt. - treatment in surface impoundments (T02) storage in surface impoundments (S04) 3 pt. - land application (D81) <u>underground tanks (S02)</u> storage in piles (S03) 2 pt. - treatment in tanks or containers (T01) incineration (T03). 1 pt. - storage in tanks or containers (S01, S02)	3	12
CHARACTER OF WASTE 1 pt. - hazardous (D,F,K,U) 2 pt. - D005 - D015, D017, U021, U043, U117, U133 - U135, U223, U232 3 pt. - acutely hazardous (P)	4	4
LOCATION OF FACILITY 1 pt. - rural 2 pt. - urban	1	2
BEST ENGINEERING JUDGEMENT lower hazard - - - - - higher hazard ① 2 3 4 5	3	3

RATIONALE FOR BEJ SCORE AND OTHER COMMENTS:

TOTAL SCORE = 28RATER: HokkanenDATE: 4/28/81

Storage areas look good, concrete pads, diking.

Storage tank underground, but has diking at inlet.

Part A, Permit Process --- Internal Checklist

ID Number CAD044696102 Inst Name The Marquardt Co.

PHASE ONE

Refer to Form No:	Interim Regulatory Requirements	Indicate by your initials:		Valid PrmIg Date?
		Yes	No	
1	T/S/D Facility? (If No, return to respondent.)	_____	_____	
3	Form 1 received?	_____	_____	
1	Form 3 received?	_____	_____	
1 & 3	Postmarked on or before November 19, 1980?	_____	_____	_____
3	Date of operation entered?	_____	_____	
3	Date of operation on or before November 19, 1980?	_____	_____	_____
Notif. record	Notifier?	_____	_____	
"	Notified on or before August 18, 1980?	_____	_____	
1	Form 1, XIII B signed?	_____	_____	
3	Form 3, IX B Signed?	_____	_____	

(If all ten items above are initialed in the Yes column, generate Interim Status Acknowledgement and indicate the trigger date here: JB)

PHASE TWO

1	Unsure if regulated or non-regulated?	_____	_____
3	New facility?	_____	_____
1 & 3	Core items missing? If Yes, indicate which items: Facility name____; location____; mail address____; operator info____; certification____; process info____; waste info____; owner____; sigs____.		

PHASE THREE

1 & 3	Non-core items missing? If Yes, indicate which items: Maps____; photos____; drawings____; lat/long____. Other observations and comments:
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Used 2C - copy made 2/23

Log out/Log in
on reverse side

Received Date Stamp 19 NOV 1980 (Stamp forms also)
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